

<p style="text-align: right;">Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA</p> <p>2</p> <p>3 MICHAEL W. HILL, et al., : C.A. No. 05-160 Erie Plaintiff : C.A. No. 03-323 Erie 4 : C.A. No. 03-355 Erie v. : C.A. No. 03-368 Erie 5 : C.A. No. 04-011 Erie JOHN J. LAMANNA, et al., : 6 Defendants :</p> <p>7</p> <p>8</p> <p>9 Deposition of STEPHEN HOUSLER, taken before and by Janis L. Ferguson, Notary Public in and for the Commonwealth of Pennsylvania, on Tuesday, 10 December 19, 2006, commencing at 10:01 a.m., at the offices of Knox McLaughlin Gornall & Sennett, P.C., 120 West 10th Street, Erie, Pennsylvania 11 16501.</p> <p>12</p> <p>13</p> <p>14</p> <p>15 For the Plaintiffs: Richard A. Lanzillo, Esquire 16 Knox McLaughlin Gornall & Sennett, PC 120 West 10th Street 17 Erie, PA 16501</p> <p>18 For the Defendants: Michael C. Colville, Esquire, AUSA 19 Office of the United States Attorney 700 Grant Street, Suite 4000 20 Pittsburgh, PA 15219 Douglas Goldring, Esquire 21 Federal Prison Industries (UNICOR) 400 First Street NW 22 Washington, DC 20534</p> <p>23</p> <p>24</p> <p>25 Reported by Janis L. Ferguson, RPR, CRR Ferguson & Holdnack Reporting, Inc.</p>	<p style="text-align: right;">Page 3</p> <p>1 STEPHEN E. HOUSLER, first having 2 been duly sworn, testified as follows:</p> <p>3</p> <p>4 DIRECT EXAMINATION</p> <p>5 BY MR. LANZILLO:</p> <p>6</p> <p>7 Q. Good morning, Mr. Housler.</p> <p>8 A. Good morning.</p> <p>9 Q. My name is Rich Lanzillo. I represent the 10 Plaintiffs in these related actions; Michael Hill, Leslie 11 Kelly, Kevin Siggers, Myron Ward, and Kenny Hill. I have 12 scheduled your deposition here today to ask you some 13 questions, primarily regarding conditions at the UNICOR 14 facility as it existed when the Plaintiffs were inmates in 15 FCI McKean.</p> <p>16 Before we get started, there are just a couple of 17 ground rules that I'll need to review with you. I presume 18 you have been through a deposition before and probably are 19 somewhat familiar with the process. Is that --</p> <p>20 A. No.</p> <p>21 Q. No? Oh, this is your first depo. Okay.</p> <p>22 A. I have never done one.</p> <p>23 Q. Okay. Well --</p> <p>24 A. I have been to a trial before, but I have never 25 been to a deposition.</p>
<p style="text-align: right;">Page 2</p> <p>1 INDEX</p> <p>2</p> <p>3 TESTIMONY OF STEPHEN HOUSLER</p> <p>4 Direct examination by Mr. Lanzillo 3</p> <p>5 Cross-examination by Mr. Goldring 45</p> <p>6 Cross-examination by Mr. Colville 54</p> <p>7 Redirect examination by Mr. Lanzillo 55</p> <p>8 Recross-examination by Mr. Colville 56</p> <p>9</p> <p>10 EXHIBITS:</p> <p>11 Housler Deposition Exhibit 1 - Page 35</p> <p>12 Housler Deposition Exhibit 2 - Page 42</p> <p>13 Housler Deposition Exhibit 3 - Page 51</p> <p>14 Housler Deposition Exhibit 4 - Page 52</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 Q. Well, the procedure is really quite simple. Both 2 my questions and your answers will be transcribed by Janis, 3 our court reporter.</p> <p>4 To ensure that the transcript is clear, it's 5 important that you verbalize all of your responses, as 6 opposed to simply shaking or nodding your head. In addition 7 to that, to ensure that there's no ambiguity in the 8 transcript, if you're going to respond to one of my 9 questions in the affirmative, try to use the word yes, and 10 if you're going to, you know, respond in the negative, try 11 to say no. If you say uh-huh or huh-uh, that can be 12 somewhat unclear on the record.</p> <p>13 Most importantly, if at any time you do not 14 understand one of my questions -- and that can be, and it 15 usually is, my fault -- if my question is unclear to you, 16 simply tell me that, and I'll rephrase it. Also, if you 17 don't hear me clearly, let me know that, and I'll repeat the 18 question.</p> <p>19 If you do respond to my question, however, I will 20 assume that you both heard it and understood it. Is that 21 fair enough?</p> <p>22 A. Fair enough.</p> <p>23 Q. Very good. Would you state your full name for the 24 record.</p> <p>25 A. Stephen Eugene Housler.</p>

<p style="text-align: right;">Page 5</p> <p>1 Q. And where do you live, Mr. Housler?</p> <p>2 A. I live at 3 Nookside Lane, Bradford, Pennsylvania</p> <p>3 16701.</p> <p>4 Q. What is the extent of your education?</p> <p>5 A. I have a B.S. in business management. I had three</p> <p>6 years of safety training. And Montana College of Mineral</p> <p>7 Science and Technology in Butte, Montana.</p> <p>8 Q. Where did you receive your Bachelor of Science</p> <p>9 degree in business management?</p> <p>10 A. University of Pittsburgh.</p> <p>11 Q. When did you graduate from Pitt?</p> <p>12 A. '92, I think.</p> <p>13 Q. You indicated that you had three years of safety</p> <p>14 training?</p> <p>15 A. Right. I went -- I went to college out in Butte,</p> <p>16 Montana from '79 to '82.</p> <p>17 Q. So your safety training in Montana actually</p> <p>18 predates your Bachelor of Science Degree from the University</p> <p>19 of Pittsburgh.</p> <p>20 A. Correct.</p> <p>21 Q. And when you were attending school in Montana,</p> <p>22 were you working toward a particular degree?</p> <p>23 A. Yes. A safety engineering degree.</p> <p>24 Q. And the name of the institution you attended, was</p> <p>25 that Montana College?</p>	<p style="text-align: right;">Page 7</p> <p>1 A. Not that I can recall. I mean, we did -- we did</p> <p>2 air monitoring and samples, and we didn't really get</p> <p>3 involved in any, like, silica dust or anything like that.</p> <p>4 It was just regular air monitoring.</p> <p>5 Q. When you went to work at FCI McKean, were you</p> <p>6 familiar with silica dust?</p> <p>7 A. No.</p> <p>8 Q. When did you start at FCI McKean?</p> <p>9 A. '89.</p> <p>10 Q. And what was your --</p> <p>11 A. July of '89 I started.</p> <p>12 Q. What was your initial position?</p> <p>13 A. I started out as a correctional officer.</p> <p>14 Q. Did you have any education or training in</p> <p>15 corrections before you started in --</p> <p>16 A. Yes. I worked over at the County Jail in</p> <p>17 Smethport prior to that, part-time, while I was going to</p> <p>18 college.</p> <p>19 Q. How long did you work at the County Jail?</p> <p>20 A. About -- I think approximately three years.</p> <p>21 Part-time.</p> <p>22 Q. And that was part-time?</p> <p>23 A. Yeah.</p> <p>24 Q. Were you commuting to college at that time?</p> <p>25 A. I -- I went to the branch campus in Bradford.</p>
<p style="text-align: right;">Page 6</p> <p>1 A. Montana College of Technology.</p> <p>2 Q. And I take it you did not complete that program?</p> <p>3 A. No.</p> <p>4 Q. Why did you leave that program?</p> <p>5 A. I -- my father had some health issues, and I had</p> <p>6 to come home. He had a business. I had to come home and</p> <p>7 assist him with that. So, therefore, I never returned.</p> <p>8 Q. What was the nature of that business?</p> <p>9 A. He worked in the oil business.</p> <p>10 Q. Where are you from originally?</p> <p>11 A. Bradford, Pennsylvania.</p> <p>12 Q. Did you attend Bradford High School?</p> <p>13 A. Yes, I did.</p> <p>14 Q. When did you graduate from high school?</p> <p>15 A. 1975.</p> <p>16 Q. When you attended Montana College of Technology,</p> <p>17 did you -- there is no pun intended here, but did you have</p> <p>18 any exposure to the topic of silica dust or Perlite? Was</p> <p>19 that covered in any of your safety --</p> <p>20 A. I didn't have any exposure to that, no.</p> <p>21 Q. Okay.</p> <p>22 A. I did have some industrial hygienist courses, but</p> <p>23 as far as being exposed to that, no.</p> <p>24 Q. And by "exposed", I mean the subject matter. Was</p> <p>25 it covered in any of your classes, discussed?</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. Okay. Pitt-Bradford.</p> <p>2 A. University of Pittsburgh, Bradford, yes.</p> <p>3 Q. Okay.</p> <p>4 A. I lived right there, yes.</p> <p>5 Q. All right. So you didn't go to the University of</p> <p>6 Pittsburgh in Oakland.</p> <p>7 A. Not the main campus, no.</p> <p>8 Q. Aside from the training you received while you</p> <p>9 attended Montana College of Technology, did you have any</p> <p>10 further safety training or education?</p> <p>11 A. When you get into the safety program for the</p> <p>12 Bureau of Prisons, they have initially a five-week class,</p> <p>13 safety-related subjects. You attend that for five weeks.</p> <p>14 I've had other new -- and every year they have an update; a</p> <p>15 weekly safety training class that you attend on regulation</p> <p>16 updates. I have had other numerous safety -- fire-related</p> <p>17 classes, hazardous material classes I have attended,</p> <p>18 compensation classes. Let me see. Incident command</p> <p>19 training, asbestos-related training, lead training.</p> <p>20 Q. When did you attend the hazardous material</p> <p>21 classes?</p> <p>22 A. I attended that up in Rochester, New York.</p> <p>23 Q. When was that?</p> <p>24 A. That might have been around 1995. I -- I really</p> <p>25 can't recall the exact year.</p>

<p style="text-align: right;">Page 9</p> <p>1 Q. The five-week training class that you received</p> <p>2 from the Bureau of Prisons, I think you indicated that you</p> <p>3 went through that training when you became a safety officer?</p> <p>4 A. When you get hired on in the safety department,</p> <p>5 yes, everybody goes through that five-week training class.</p> <p>6 Q. And when would you have attended that class? When</p> <p>7 did you attend that class?</p> <p>8 A. That would have been around 1993.</p> <p>9 Q. And where was that class --</p> <p>10 A. That class was held in Denver.</p> <p>11 Q. Denver?</p> <p>12 A. At our training center. We have a training center</p> <p>13 there. It was held there.</p> <p>14 Q. Aside from the Bureau of Prisons training classes</p> <p>15 and the various updates and programs that you received</p> <p>16 through the Bureau of Prisons -- and I understand you may</p> <p>17 not have named all of them.</p> <p>18 A. Right.</p> <p>19 Q. You worked from memory. But aside from what you</p> <p>20 received in-house through the prison system, have you</p> <p>21 received any other safety training other than what we have</p> <p>22 talked about?</p> <p>23 A. No. Just what we have talked about there.</p> <p>24 Q. What is your current employment?</p> <p>25 A. Position?</p>	<p style="text-align: right;">Page 11</p> <p>1 the process of changing over to a plastics factory, where</p> <p>2 they are manufacturing plastic trays, silverware, plastic</p> <p>3 cups; those type of items.</p> <p>4 Q. When did the UNICOR facility at FCI McKean stop</p> <p>5 making furniture?</p> <p>6 A. Well, they -- they stopped totally probably about</p> <p>7 nine months ago. As far as their final shipments of</p> <p>8 everything out, moving all their equipment out, the</p> <p>9 woodworking equipment out and so forth.</p> <p>10 Q. Who is your immediate supervisor?</p> <p>11 A. My immediate supervisor currently now is Cherry</p> <p>12 Robare.</p> <p>13 Q. And what is Ms. Robare's position?</p> <p>14 A. Ms. Robare is the associate warden of operations.</p> <p>15 Q. And how long has she held that position?</p> <p>16 A. Three years she's been at FCI McKean.</p> <p>17 Q. And who was your supervisor prior to Ms. Robare?</p> <p>18 A. Prior to that, I was supervised by Monica</p> <p>19 Rectenwald. She is currently the executive assistant.</p> <p>20 Q. And what was her position at the time she was your</p> <p>21 supervisor?</p> <p>22 A. Executive assistant.</p> <p>23 Q. Do you have any staff that answer to you?</p> <p>24 A. I have two staff members who work under me in my</p> <p>25 department.</p>
<p style="text-align: right;">Page 10</p> <p>1 Q. Yes.</p> <p>2 A. I'm the safety manager at FCI McKean.</p> <p>3 Q. And how long have you held that position?</p> <p>4 A. 12 years.</p> <p>5 Q. So since about 1994?</p> <p>6 A. Right.</p> <p>7 Q. And what are your responsibilities as the safety</p> <p>8 manager at FCI McKean?</p> <p>9 A. We're -- we're responsible for monitoring the</p> <p>10 safety programs; make sure we're within policy, as like OSHA</p> <p>11 policy, EPA policy. We conduct regular safety sanitation</p> <p>12 inspections. We have some weekly ones we do, we have</p> <p>13 monthlies we are required to do. We are responsible for</p> <p>14 monitoring the compensation program. And we're just --</p> <p>15 we're responsible for the overall safety of both staff and</p> <p>16 inmates.</p> <p>17 Q. Would it be fair to say that you are the person</p> <p>18 principally responsible for providing a safe and healthful</p> <p>19 environment for inmates and staff at the facility?</p> <p>20 A. Yes, that would be correct.</p> <p>21 Q. And that would include the UNICOR facility?</p> <p>22 A. Correct.</p> <p>23 Q. What is the status of the UNICOR facility at FCI</p> <p>24 McKean? It's no longer making furniture, is it?</p> <p>25 A. It's no longer a furniture factory. They are in</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. What are their positions?</p> <p>2 A. The one position is a safety specialist, and the</p> <p>3 other position is a safety specialist trainee.</p> <p>4 Q. Has that been the structure since, let's say,</p> <p>5 2002?</p> <p>6 A. Yes. It hasn't been the same trainee.</p> <p>7 Q. Right.</p> <p>8 A. It was a different one at --</p> <p>9 Q. I understand the personnel may have changed, but</p> <p>10 in terms of the staffing structure, with you</p> <p>11 supervising two --</p> <p>12 A. Yes.</p> <p>13 Q. -- individuals --</p> <p>14 A. It's always been two, yes.</p> <p>15 Q. Back in the time frame of 2001, 2002, 2003,</p> <p>16 approximately how many inmates worked in the UNICOR</p> <p>17 facility?</p> <p>18 A. Probably 150 to 200. They ran two shifts.</p> <p>19 Q. What was the size of the overall inmate population</p> <p>20 at FCI McKean?</p> <p>21 A. Approximately 1400. That's in our main</p> <p>22 institution. We have two institutions there.</p> <p>23 Q. How would an inmate become part of the UNICOR</p> <p>24 program, actually get to work in the UNICOR facility?</p> <p>25 A. They have to send a cop-out in, they call it; a</p>

3 (Pages 9 to 12)

<p style="text-align: right;">Page 13</p> <p>1 request to the staff member down there to be placed on the</p> <p>2 UNICOR list for employment. And the list is pretty long.</p> <p>3 And they would just wait until they were called to start</p> <p>4 working down there.</p> <p>5 Q. And was there any discretion in terms of who got</p> <p>6 the position, or was it just a matter of seniority or order</p> <p>7 on the list?</p> <p>8 A. If you had prior UNICOR experience from other</p> <p>9 UNICORs at other facilities, you were considered priority.</p> <p>10 So you would be hired before somebody who didn't have prior</p> <p>11 UNICOR experience.</p> <p>12 Q. Were there any requirements or considerations</p> <p>13 regarding the inmate's behavior or other factors that might</p> <p>14 influence how quickly an inmate would get a position at</p> <p>15 UNICOR?</p> <p>16 A. No.</p> <p>17 Q. So good behavior wouldn't get you quicker</p> <p>18 consideration?</p> <p>19 A. No.</p> <p>20 Q. Were those sought-after positions?</p> <p>21 A. UNICOR is a very sought-after position. They pay</p> <p>22 the most.</p> <p>23 Q. Among the jobs you can have within the prison</p> <p>24 facility, was UNICOR one of the higher skill areas?</p> <p>25 A. Yeah, it's higher -- highly skilled. You're</p>	<p style="text-align: right;">Page 15</p> <p>1 Q. Did you know that the dust included mineral fiber?</p> <p>2 A. Hum-um.</p> <p>3 Q. That's a no?</p> <p>4 A. No.</p> <p>5 Q. You have --</p> <p>6 A. I'm sorry.</p> <p>7 Q. That's all right. Did you know that the dust</p> <p>8 included silica dust?</p> <p>9 A. No.</p> <p>10 Q. Did you know that the dust included Perlite,</p> <p>11 P-E-R-L-I-T-E?</p> <p>12 A. No.</p> <p>13 Q. But what you did know is that cutting or sawing</p> <p>14 would release some sort of dust in the vicinity of the</p> <p>15 operator.</p> <p>16 A. Yes. Some dust is released anytime you do any</p> <p>17 type of cutting.</p> <p>18 Q. Right. Prior to the OSHA inspection, what did you</p> <p>19 know about the potential health impacts or hazards</p> <p>20 associated with the dust created by the use or cutting of</p> <p>21 Micore board?</p> <p>22 A. Can you repeat that.</p> <p>23 Q. Sure. Prior to the commencement of the OSHA</p> <p>24 inspection on April 16th, 2003, what did you know about the</p> <p>25 potential health effects or hazards created by the dust</p>
<p style="text-align: right;">Page 14</p> <p>1 learning to operate equipment. It's -- of course, the other</p> <p>2 details, you're operating some equipment, but not the type</p> <p>3 of equipment you would be operating in UNICOR.</p> <p>4 Q. So no prior factory experience was required, I</p> <p>5 take it, to work at UNICOR?</p> <p>6 A. No.</p> <p>7 Q. Among the materials handled by inmates, am I</p> <p>8 correct that there was materials known as Micore board?</p> <p>9 A. Yes.</p> <p>10 Q. For a convenience time reference here, let me just</p> <p>11 direct you to the period prior to the OSHA inspection, which</p> <p>12 I think commenced on or about April 16th, 2003. And let me</p> <p>13 ask you, prior to that OSHA inspection, what did you know</p> <p>14 about Micore board? Personally.</p> <p>15 A. Personally? I -- I knew that it -- it did create</p> <p>16 some dust. I didn't -- I didn't know a whole lot about it.</p> <p>17 I did review the Material Safety Data Sheet. I saw no</p> <p>18 issues, really, with it.</p> <p>19 Q. So you knew that when the material was handled --</p> <p>20 for example, when it was sawed, it would fracture the</p> <p>21 material, obviously, and create dust?</p> <p>22 A. Create small amounts of dust, yes.</p> <p>23 Q. And did you know the composition or constituent</p> <p>24 parts of that dust?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 16</p> <p>1 generated by the cutting of Micore board?</p> <p>2 A. I didn't really know of many health hazards</p> <p>3 associated with it. I didn't know.</p> <p>4 Q. Did you know any health hazards associated with</p> <p>5 it?</p> <p>6 A. No.</p> <p>7 Q. Did you know whether any materials in the dust</p> <p>8 were a potential carcinogen?</p> <p>9 A. Hum-um.</p> <p>10 Q. That's a no?</p> <p>11 A. No.</p> <p>12 Q. Did you know that the dust could cause silicosis?</p> <p>13 A. No.</p> <p>14 Q. Did you know whether the dust could cause</p> <p>15 autoimmune diseases?</p> <p>16 A. No.</p> <p>17 Q. Did you know whether the dust could cause skin</p> <p>18 irritation?</p> <p>19 A. No.</p> <p>20 Q. Respiratory dysfunction?</p> <p>21 A. No.</p> <p>22 Q. Well, had you read the MSDS sheet for Micore</p> <p>23 board?</p> <p>24 A. I reviewed it, yes.</p> <p>25 Q. After reviewing -- when did you review the MSDS</p>

Page 17

1 sheet?

2 A. I reviewed it after we got a couple complaints

3 from the OSHA.

4 Q. Had you reviewed the MSDS sheet for Micore board

5 prior --

6 A. No.

7 Q. -- to OSHA's inspection?

8 A. No.

9 Q. Who maintained the MSDS sheets?

10 A. We maintained some in our office, and they

11 maintain them in the UNICOR factory also.

12 Q. Did your responsibilities as the safety manager

13 include review of MSDS sheets?

14 A. Yeah, we review them.

15 Q. Is there any reason why you didn't review the MSDS

16 sheet for Micore board?

17 A. I didn't really see any health hazards opposed

18 by -- or caused by Micore board, so I really didn't review

19 it very thoroughly.

20 Q. Well, again, prior to the OSHA inspection, had you

21 reviewed it at all?

22 A. No.

23 Q. Had you observed cutting operations involving

24 Micore board; cutting and sawing operations?

25 A. Yes.

Page 18

1 Q. And you had observed those cutting and sawing

2 operations of Micore board prior to the OSHA inspection, I

3 assume.

4 A. Right, yes.

5 Q. So you knew that that Micore board generated some

6 amount of dust?

7 A. Some dust, yes.

8 Q. All right.

9 A. But that dust was taken care of with our

10 ventilation and our system that collect -- collects dust.

11 Q. Well, when an inmate would use, let's say, a table

12 saw --

13 A. Right.

14 Q. -- with a piece of Micore board or one or more

15 pieces of Micore board, and they would push that Micore

16 board through that saw, not all of the dust would go into

17 the ventilation system, would it?

18 A. Majority of the dust went into the dust-collecting

19 system. Yes, it did.

20 Q. Okay. But you knew not all of it.

21 A. Not all of it, no.

22 Q. And, in fact, did you observe that after the

23 operation of a saw, there would be dust in and around the

24 area of operation of the saw?

25 A. There would be a small amount, yes.

Page 19

1 Q. And there would be dust on the clothing and on the

2 person of the inmate too, wouldn't there?

3 A. Possible.

4 Q. Did you observe that?

5 A. I didn't observe it, no.

6 Q. Did you ever see the inmates blowing dust off

7 themselves using the pneumatic or air pressure --

8 A. No.

9 Q. Did you ever see dust in the hair of the --

10 A. No.

11 Q. -- inmates? How often were you present on the

12 facility floor at UNICOR?

13 A. I'm -- I go down to the UNICOR factory at least

14 three times a week. And if I -- if I'm not down there, I'm

15 not there, I make sure one of my staff goes down there and

16 walks around, monitors it.

17 Q. Were there ever any problems with the functioning

18 of the ventilation system that you have described removing

19 the dust from the saws and other machines that cut the

20 Micore board?

21 A. The dust collection system functioned all the

22 time. We had a maintenance man who monitored it, and if

23 there was any issues with it, he corrected them immediately.

24 I was never aware of any problems with the dust-collecting

25 system. It functioned properly at all times.

Page 20

1 Q. Prior to the OSHA inspection beginning on

2 April 16, 2003, did you or the facility itself have any

3 policies in place or procedures in place regarding the use

4 of respirators or masks when utilizing table saws in cutting

5 Micore board?

6 A. We didn't use respirators in our UNICOR factory

7 because we had our dust collection system. We did have

8 nuisance dust masks that were available for inmates out of

9 our tool room there. If they wanted to wear one, they could

10 request to wear one, and they were given a nuisance dust

11 mask.

12 Q. Were inmates instructed to wear a mask when

13 utilizing the Micore board?

14 A. No.

15 Q. So they weren't required to wear a mask if --

16 A. No. That was strictly their choice.

17 Q. Was there any training provided to inmates

18 regarding any potential hazards associated with the cutting

19 or sawing of Micore board?

20 A. Their foremen are required to teach them how to

21 run the machines, any training. I have an initial -- when

22 the inmates first arrive to the class, we have an A & O

23 class, and I do some safety training, and I do some lecture

24 on different safety issues, and inmates are trained there,

25 yes, by me. But it's the supervisors' responsibility to do

5 (Pages 17 to 20)

Page 21

1 the initial training when they are hired in UNICOR.

2 Q. What responsibility, if any, do you have relative
3 to the supervisors at the UNICOR facility?

4 A. We have annual training every year, and I train
5 them on different safety issues, and they are required to
6 train -- attend that.

7 Q. So you would be the principal source of their
8 training in-house as far as the procedures and materials in
9 use at UNICOR?

10 A. Correct.

11 Q. Now, would it be accurate to say that you did not
12 provide any training to any inmates regarding any potential
13 health hazards associated with Micore board?

14 A. That's correct.

15 Q. And the same would be true relative to supervisors
16 at the UNICOR facility. You did not provide any training to
17 those individuals regarding potential health hazards
18 associated with Micore board.

19 A. Correct.

20 Q. All right. And that would necessarily be true
21 because at least with respect to the MSDS sheet, you hadn't
22 reviewed it, at least prior to the OSHA inspection.

23 A. Correct.

24 Q. All right. Did any inmate or staff member ever
25 complain about health problems or health concerns regarding

Page 23

1 A. I have no documentation that came to me, no. And
2 I'm down in that UNICOR factory at least three or four times
3 a week walking around. And if you -- if you think that I'm
4 going to expose myself or any of the other 18 other staff
5 down there or any of the inmates down there to a hazardous
6 environment, you're wrong. I'm not going to do that.

7 Q. You mentioned that you have no documentation
8 regarding anything from Robin. But did any of the staff
9 members ever indicate to you, even verbally, that Robin
10 Bevevino had raised concerns about the cutting of Micore
11 board?

12 A. No.

13 Q. The dust mask that you mentioned, do you know if
14 they are NIOSH approved?

15 A. A nuisance dust mask is not considered a
16 respirator, and they are not NIOSH approved, no.

17 Q. Was there any policy or procedure in place at any
18 time at the UNICOR facility regarding proper clothing to be
19 worn when working with Micore board?

20 A. No.

21 Q. So --

22 A. Inmates wore their basically khaki clothes,
23 long-sleeved shirts, their khaki pants, their safety shoes.
24 That's what they were required -- required to wear when they
25 reported to work.

Page 22

1 Micore board?

2 A. I never received a complaint from anybody
3 concerning Micore board. And I make it very clear in my A &
4 O lessons to inmates, if they have a problem that's related
5 to safety, they need to contact me and let me know what
6 their problem is. I will investigate it, and if there is an
7 issue, I will correct the problem. No one ever came to me
8 if they had a problem with the Micore board and the air
9 monitoring. Had they come to me, I would have checked it
10 out.

11 Q. Did you ever hear indirectly about any health
12 concerns or potential health problems associated with Micore
13 board?

14 A. No. Nobody ever mentioned it to me or came to me.

15 Q. Did you ever learn from any source that, for
16 example, Robin Bevevino had problems regarding --

17 A. Robin Bevevino never approached me. I had other
18 dealings with Robin Bevevino, but he never approached me as
19 far as any type of issue with the sawing, with the Micore
20 board. He had some worker compensation injuries, and that's
21 what I dealt with Robin Bevevino. That was it.

22 Q. Did anyone else on the staff ever express to you,
23 verbally or in writing, that Robin Bevevino had raised
24 concerns about hazardous substances created by the cutting
25 of Micore board?

Page 24

1 Q. Is --

2 A. Inmates were allowed to remove and wear T-shirts
3 in the summer when it was much more hotter. That was their
4 choice.

5 Q. Mr. Housler, when you mentioned the inmates
6 reporting to work -- in other words, when they would come
7 from other parts of the prison, their cells, their
8 residence, they would report in their work clothes?

9 A. Correct.

10 Q. And then when they would leave, they would go back
11 to their cells or their residence in those same work
12 clothes?

13 A. Um-hum.

14 Q. Yes?

15 A. Inmates were also required to wear -- coveralls
16 were available too.

17 Q. Let me just back up for a second, because you used
18 an "um-hum", and I just want to make sure --

19 A. Yes. Yes.

20 Q. Okay. So they would -- they would leave in the
21 same clothes that they reported in.

22 A. Yes.

23 Q. All right. And go back to their residence.

24 A. (Witness nods head.)

25 Q. Yes?

6 (Pages 21 to 24)

Page 25

1 A. Yes.

2 Q. Now, they had the option of wearing coveralls?

3 A. Yes. Coveralls were available.

4 Q. And when did coveralls become available?

5 A. They were available all the time down there.

6 Q. Were they -- were inmates required to wear

7 coveralls?

8 A. They weren't required to, no.

9 Q. Were they encouraged or trained to wear coveralls?

10 A. That was their decision, whether they wanted to

11 wear them or not. We didn't force them to wear them. That

12 was their decision.

13 Q. Was there any explanation provided regarding the

14 wearing of coveralls, other than to tell the inmate that

15 they are available?

16 A. No.

17 Q. They weren't required to wear long-sleeved shirts

18 that --

19 A. They weren't required to, no. If they did, they

20 had to be buttoned, and they had to be -- they couldn't be

21 loose. They had to be tight-fitting.

22 Q. To avoid equipment hazards.

23 A. To avoid getting caught in a piece of equipment or

24 something, yes.

25 Q. Were goggles provided?

Page 26

1 A. Safety glasses are mandatory down there, yes.

2 Q. And those are safety glasses -- I'm holding --

3 A. Approved, yes.

4 Q. They weren't tight-fitting goggles, though?

5 A. No, they weren't tight-fitting goggles. Regular

6 safety glasses.

7 Q. They didn't have a strap around to pull tight to

8 the head?

9 A. No.

10 (Discussion held off the record.)

11 Q. Any special laundry procedures --

12 (Brief interruption in proceedings.)

13 Q. Mr. Housler, were there any procedures in place

14 regarding how clothing worn in the UNICOR facility was to be

15 handled for laundry purposes?

16 A. Washers and dryers were available in the housing

17 units for the inmates to launder their own clothes. And we

18 also have a laundry -- laundry -- institution laundry where

19 if inmates can't do their own laundry, they can take them

20 there and they can be done by staff and inmate detail there.

21 Q. But as far as someone working in the UNICOR

22 facility, no one was required to launder their work clothes

23 separately from the general clothing of the inmates --

24 A. No. None of our details are required to do that.

25 Q. Let me ask you about cleanup policies and

Page 27

1 procedures. To whatever extent dust was generated by sawing

2 or other operations involving Micore board, how would that

3 dust be cleaned up? At the end of a shift or periodically

4 throughout the shift?

5 A. If there was dust on the top of machines, they

6 would have a little dust brush. They would sweep it off on

7 the floor. Use Shop-Vacs. We did, underneath machines,

8 where it was tough to get areas, we did use some air hose --

9 hoses. The air lines had regulators on, as our policy

10 requires, and it restricts the PSI to 30 pounds.

11 Q. 30 pounds?

12 A. They did use some -- some air underneath. But

13 they swept it off. And they could sweep it right into the

14 dust-collecting system itself while it was running on the

15 piece of machinery. Some of our machines, our CNC saws,

16 they had hoses that came down where the suction system was

17 connected into it, and that's how they cleaned some of the

18 dust and sawdust off, yes.

19 Q. The vacuums, were those like Shop-Vac types?

20 A. Shop-Vacs, yes.

21 Q. When did the Shop-Vacs --

22 A. We had them down there all along.

23 Q. Were those filtered Shop-Vacs, do you know?

24 A. I don't think so, no. Just regular Shop-Vacs.

25 Q. To your knowledge, none of the inmates complained

Page 28

1 about respiratory problems or skin irritation?

2 A. No inmates ever came to me about respiratory

3 problems or skin irritations.

4 Q. And it's also your testimony that you didn't hear

5 about that through other sources?

6 A. No.

7 Q. I take it your answer is no, I didn't hear about

8 that from other sources.

9 A. I didn't hear about that from other sources, no.

10 Q. Prior to the OSHA inspection in April of 2003,

11 what did you know about Lokweld? Lokweld 860/861.

12 A. Lokweld glue was used in our spray booth for

13 gluing the laminate onto the particle board.

14 Q. Was it used anywhere else?

15 A. It was used in our special projects area for

16 special projects we did for some of the institution

17 departments. It was used in small amounts. If they needed

18 it, they used a brush to brush it on the piece of wood that

19 they were gluing.

20 Q. So in the special projects area, that would be

21 outside of the spray booth?

22 A. Um-hum.

23 Q. Yes?

24 A. Yes. I'm sorry. Yes.

25 Q. And to apply the Lokweld glue, they would take a

7 (Pages 25 to 28)

<p style="text-align: right;">Page 29</p> <p>1 brush and --</p> <p>2 A. Use -- use a paint brush, spread it on there,</p> <p>3 yeah.</p> <p>4 Q. What, dip it into the can and then --</p> <p>5 A. Um-hum. Dip it into a can they had of it, yes.</p> <p>6 Q. And how large were the containers or cans of the</p> <p>7 Lokweld?</p> <p>8 A. The -- the ones for the spray booth?</p> <p>9 Q. No, for the --</p> <p>10 A. They were 55-gallon drums that were stored in a</p> <p>11 flammable [sic] cabinet.</p> <p>12 Q. What about in the area of the special projects?</p> <p>13 A. When they were done using it, there was a smaller</p> <p>14 flammable cabinet that they stored in there.</p> <p>15 Q. So if they were using it in the special projects</p> <p>16 area, they would open up a 55-gallon drum and then --</p> <p>17 A. Oh, no. They had it in a smaller -- smaller</p> <p>18 gallon container, like.</p> <p>19 Q. And have you ever read the MSDS for the Lokweld?</p> <p>20 A. Yes.</p> <p>21 Q. When was the first time that you read the MSDS</p> <p>22 sheet for the Lokweld?</p> <p>23 A. When they first started using it.</p> <p>24 Q. And when was that?</p> <p>25 A. Pretty much all along. When the factory opened</p>	<p style="text-align: right;">Page 31</p> <p>1 Q. And who would have been the foreman at the time?</p> <p>2 A. I can't really say who the foreman was. They</p> <p>3 rotate who they supervised down there, so I -- I really</p> <p>4 can't say who the foreman was. But staff were aware that</p> <p>5 the Lokweld was very flammable, and they were -- they were</p> <p>6 aware of that, and they knew -- and we did handle it</p> <p>7 properly. We maintained it in flammable cabinets. So they</p> <p>8 were aware of the hazards associated with the Lokweld glue,</p> <p>9 as were the inmates.</p> <p>10 Q. But the inmates had not received any training in</p> <p>11 that area, had they?</p> <p>12 A. Well, their supervisor is required to train them.</p> <p>13 They are aware of it. They are required to make them aware</p> <p>14 of any hazards working with it.</p> <p>15 Q. Is it fair to say you didn't provide any inmates</p> <p>16 with training in --</p> <p>17 A. I didn't provide any training, no.</p> <p>18 Q. And do you have any personal knowledge that any</p> <p>19 supervisor actually did provide training regarding --</p> <p>20 A. No.</p> <p>21 Q. -- Lokweld or the Micore board?</p> <p>22 A. No.</p> <p>23 Q. As part of the OSHA citations, there was a</p> <p>24 Citation No. 2, Item 1, which stated, quote, "Employees who</p> <p>25 wear voluntary use respirators were not provided with</p>
<p style="text-align: right;">Page 30</p> <p>1 up, we started using it, yes.</p> <p>2 Q. When did the factory open? 1989?</p> <p>3 A. Yeah, right.</p> <p>4 Q. Did you provide any special training to inmates</p> <p>5 regarding specifically the Lokweld product?</p> <p>6 A. No.</p> <p>7 Q. As part of the citations issued by OSHA after its</p> <p>8 inspection, there was a Citation 2, Item 3, which</p> <p>9 referenced, quote, "Employee training did not include the</p> <p>10 physical and health hazards of the chemicals in the work</p> <p>11 area." It further stated, quote, "FCI McKean, Hazard</p> <p>12 Communication Program: Personnel were potentially exposed</p> <p>13 to a variety of chemicals that included, but were not</p> <p>14 limited to, Micore board and Lokweld 860/861. The hazard</p> <p>15 communication training program did not include a review of</p> <p>16 the physical and health hazards of the specific chemicals</p> <p>17 utilized in the workplace. As a result, personnel were not</p> <p>18 provided with effective information to ascertain the</p> <p>19 measures needed to protect themselves from the chemicals'</p> <p>20 physical and health hazards." And there's a citation to</p> <p>21 Federal Regulation 29 CFR 1910.1200(h)(2)(ii).</p> <p>22 My question is, who would have been responsible</p> <p>23 within FCI McKean and UNICOR for this area of safety</p> <p>24 compliance; the --</p> <p>25 A. My -- myself and the foreman.</p>	<p style="text-align: right;">Page 32</p> <p>1 training on the basic advisory information contained in the</p> <p>2 29 CFR 1910.134 Appendix D." It goes on to state, "UNICOR</p> <p>3 Factory/Respirator Program: Personnel did not receive</p> <p>4 training on the information noted," in the regulation I just</p> <p>5 cited. "These personnel utilized the 3M 8500 Comfort Mask."</p> <p>6 Would that also have been an item within the scope</p> <p>7 of your responsibility?</p> <p>8 A. Yes. If they are wearing them, yes.</p> <p>9 Q. Now, there are quite a number of noted violations</p> <p>10 and citations in the OSHA report. Rather than go through</p> <p>11 each one of them, would it be fair to say that all of these</p> <p>12 safety issues would have fallen within the scope of your</p> <p>13 responsibilities?</p> <p>14 A. Yes.</p> <p>15 Q. Prior to the OSHA inspection, were any air quality</p> <p>16 tests performed at the facility?</p> <p>17 A. Yes. We had Microbac Laboratories come in and do</p> <p>18 some air monitoring.</p> <p>19 Q. And when did that occur?</p> <p>20 A. I'm not sure of the exact date.</p> <p>21 Q. Other than the --</p> <p>22 A. Can I look at my notes?</p> <p>23 Q. Sure.</p> <p>24 A. I might have it written in my notes.</p> <p>25 Q. Yes.</p>

8 (Pages 29 to 32)

Page 33

1 A. July 31st, '01 they came in and did air monitoring
 2 for us. Prior to that, we didn't have any.
 3 Q. What prompted that air testing?
 4 A. We had got another -- a complaint from OSHA, a
 5 written complaint from OSHA, another one, and I recommended
 6 to our factory manager and our -- the associate warden of
 7 operations that we have some type of air monitoring done to
 8 assure that we were within policy and air quality standards.
 9 And I might say, that was a battle to get it done.
 10 Q. And how so?
 11 A. I just had to -- I had to be real firm to get it
 12 done. I got some opposition to it. But I stood -- stood
 13 firm on -- firm on it. I said that was our best way to
 14 prove that we -- our air quality and our standards were
 15 where they needed to be in the factory. And I finally
 16 convinced the staff that were against it to do it.
 17 Q. Who opposed the air testing?
 18 A. The supervisor of industries.
 19 Q. Who was that?
 20 A. Mrs. Forsyth.
 21 Q. Did she tell you why?
 22 A. I think -- I think she didn't really want to spend
 23 the money. She thought our air quality was fine as it was.
 24 And we felt that -- she felt that our dust collection system
 25 was doing a sufficient job as it was. So --

Page 34

1 Q. Did anyone else oppose the testing?
 2 A. My associate warden at the time was Cindy
 3 Billisits. She -- she was a little opposed to it too, and
 4 she was on Miss Forsyth's side. But after we talked and I
 5 sent her an e-mail that -- how I was very opposed to it,
 6 they wanted to send this one report up to OSHA, and it -- it
 7 didn't meet the standards that I felt we needed to, to prove
 8 that our quality was where it should be, and I sent her an
 9 e-mail, and I told her what I felt, and I told her I would
 10 not support the information that they wanted to send. And
 11 if they wanted to send that information to OSHA, they could
 12 contact the OSHA compliant officer and send it themselves. I
 13 refused to lower the standards of my department and make
 14 myself look foolish by sending a report up like that. And
 15 then they finally woke up, and we did the air monitoring.
 16 Which we should have done right from the beginning.
 17 Q. The air monitoring performed by Microbac in 2001,
 18 where was the sampling conducted? Where did they set up the
 19 air sampling units?
 20 A. Oh, boy. It was -- it was set up at different
 21 pieces of equipment, at machinery in there. The large table
 22 saws, the routers, I think the CNN -- the CNC they were set
 23 up. They were set up at different areas throughout the
 24 factory so we could get an overall reading of the total air
 25 quality.

Page 35

1 (Discussion held off the record.)
 2 Q. Mr. Housler, I'm showing you a document that we'll
 3 mark as your Deposition Exhibit 1.
 4 MR. LANZILLO: And I will make photocopies for
 5 counsel.
 6 (Housler Deposition Exhibit 1
 7 marked for identification.)
 8 Q. This is a document that was produced to us by
 9 OSHA. I'm asking you, have you ever seen Exhibit 1 prior to
 10 today?
 11 A. No. No, I have never seen this.
 12 Q. Do you see the handwritten narrative on the first
 13 page of Exhibit 1?
 14 A. Uh-huh. Yes.
 15 (Discussion held off the record.)
 16 (Recess held from 10:56 a.m. till 11:00 a.m.)
 17 Q. Examining Exhibit 1, Mr. Housler, you have already
 18 indicated that you haven't seen this document prior to
 19 today. Do you recognize the handwriting?
 20 A. No.
 21 Q. Do you have any knowledge as to who authored this
 22 document?
 23 A. Who wrote it?
 24 Q. Yes.
 25 A. No.

Page 36

1 Q. The narrative --
 2 A. I have -- suspect who wrote it, but I don't know,
 3 no.
 4 Q. Who do you suspect wrote it?
 5 A. Probably the compliance officer from OSHA who was
 6 in to do the inspection, I would say.
 7 Q. The hazard description/location here states, "The
 8 factory is processing Micore board with a power saw and no
 9 respirators are being furnished --" it says actually "being
 10 furnish", but I think they meant to say furnished -- "to
 11 staff or inmates. One of the saws has a Shop-Vac on it for
 12 dust collection, and the dust is circulating all over the
 13 factory. BOP staff and inmates are receiving irritation to
 14 eyes and skin and complaining of being congested. Inmates
 15 are also smoking in the vicinity. When cleanup occurs, air
 16 hoses are used to push the debris away."
 17 My question is: Do you have any reason to believe
 18 that the narrative provided in Exhibit 1 is inaccurate or
 19 was inaccurate as of April of 2003?
 20 A. Absolutely it's inaccurate.
 21 Q. What parts do you disagree with?
 22 A. Number one. Respirators were not required to be
 23 used because we didn't -- we didn't have an air quality
 24 issue.
 25 Q. But it would --

Page 37

1 A. Number one.

2 Q. Let me just ask you, though --

3 A. The dust-collecting system was -- was collecting

4 the dust at the point of operations of all pieces of

5 equipment. Every piece of equipment we had was hooked into

6 the dust-collecting system. We had two dust-collecting

7 systems. They -- they -- they collected -- their rating was

8 34,000 cubic feet per minute. So they were doing -- and we

9 had five machines hooked into one system. I think the -- I

10 think 12 into the other one. The five that were hooked into

11 the one were -- were drawing 9100 cubic feet per minute.

12 That left us with, what, 20 -- 24 -- 20-some thousand. The

13 other one was a little over 11,000. That left us with

14 around 13,000 cubic feet of air.

15 Whenever we buy a piece of equipment, the

16 manufacturer sends you specifications for the minimal amount

17 of cubic feet per air you need to draw on that piece of

18 equipment. We are well above what was required to -- to

19 handle those pieces of equipment and to collect the dust

20 system. Our dust collection system was so strong, we had --

21 we lost tools in it. We had crescent wrenches,

22 screwdrivers, and tape measures get sucked up in it. That's

23 how strong it was.

24 So I'd say it's doing its job, if it will suck a

25 wrench up in it. So I have to disagree with that. Number

Page 38

1 one.

2 Q. Okay. Anything else?

3 A. Number two, I had mentioned about the cleanup.

4 When they cleaned up, they used a brush on top, swept the

5 dust in the brush collection. They did utilize hoses

6 underneath the piece of equipment in hard-to-reach areas.

7 Q. How about --

8 A. Smoking, we had a smoking area --

9 Q. Let me stop you for a second. Hold on for a

10 second. Did they use brooms on the floor?

11 A. They did use brooms to push -- yes, sweep stuff

12 into piles.

13 Q. Go ahead.

14 A. Smoking, yes, we had a smoking area in the

15 factory, because inmates were not allowed to leave the

16 factory to go out and smoke. So we had a smoking area to

17 accommodate them. We now do not, because we are a

18 nonsmoking institution. We have since quit smoking.

19 As far as walking through there, eye irritation,

20 skin irritation, my eyes were never irritated when I walked

21 through there, and I was down there all the time. So I

22 don't believe that for one minute. Eye irritation.

23 Skin irritation, the guys working with the Micore

24 board, maybe they did have it, but nobody ever reported it

25 to me. If you don't report something to me, I can't take

Page 39

1 care of the issue. You know what I mean?

2 Q. Now, you were down there -- you or one of -- a

3 member of your staff was there, what, three times a week,

4 approximately?

5 A. At least.

6 Q. And how long would you typically stay in the

7 facility?

8 A. I'm down there a good hour or more. Plus, I have

9 to stand mainline every day when we do feed the inmates; a

10 mandatory hour. If an inmate has a problem, all they have

11 to do is approach me and say, hey, I got a problem down

12 here; I have -- I'm getting irritation from working with a

13 certain project. I'd go down and check it. Not one inmate

14 or staff approached me and said that to me.

15 Q. What is mainline?

16 A. Mainline is when we feed them lunch and dinner.

17 What else do you want -- let me read this. I don't -- I

18 don't know where that was, where the saw had a -- dust

19 collecting was used; a Shop-Vac. I don't know where that

20 is. I never saw that.

21 Another thing, if inmates have an injury, a

22 work-related injury, they have a compensation program, same

23 as staff does. All they have to do is they go to health

24 services, they send the initial injury report. I have some

25 reports that I send to their supervisor. Their supervisor

Page 40

1 fills it out, sends it back to me. And if I had got a

2 report from an inmate who went to health service that said

3 they have an irritation down there from working with the

4 Micore board, I would have went down and checked it out and

5 talked to the supervisor and asked them if there was an

6 issue.

7 Q. How would those reports get to you?

8 A. They come from health services. Initial injury

9 report. Health services does an evaluation if an Inmate has

10 an injury, whether it's work-related, nonwork-related. They

11 send me the work-related. There's a box on there,

12 work-related, nonwork. They check the work-related one,

13 they send it to me. I, in turn, send some paperwork to

14 their supervisor to complete, and they send it back to me,

15 and we review them. And if there is an issue, we'll check

16 it out.

17 Q. Have you ever received a report from health

18 services, whether related to Micore board or not, indicating

19 that an inmate had any type of a chronic irritation or a

20 respiratory problem?

21 A. No.

22 Q. I mean, I assume that if someone showed up at

23 health services with a -- you know, a broken arm or a

24 mangled finger and said, yeah, I was using a machine and got

25 caught, and I injured myself, that type of report at least

<p style="text-align: right;">Page 41</p> <p>1 should be referred to you.</p> <p>2 A. Absolutely. It will be, and we'll do an</p> <p>3 investigation. I mean, if somebody breaks their arm in a</p> <p>4 machine, we're going to go down and check it out. We're</p> <p>5 going to take pictures. We're required to do an</p> <p>6 investigation.</p> <p>7 Q. Have you ever received any reports of that type of</p> <p>8 a traumatic injury?</p> <p>9 A. From UNICOR?</p> <p>10 Q. Yes.</p> <p>11 A. Yeah, we've had a couple traumatic injuries down</p> <p>12 there that we have investigated. Yes.</p> <p>13 Q. Have you ever investigated any nontraumatic</p> <p>14 injuries, ones like respiratory irritation, skin irritation,</p> <p>15 eye irritation, anything of that nature?</p> <p>16 A. No, I never had a complaint. But I'll tell you</p> <p>17 one complaint I did receive from an inmate. We were doing</p> <p>18 some construction work out by the -- the main door to</p> <p>19 UNICOR, and we had some fence up. We had to put some fence</p> <p>20 up, and we used cables, the nylon cable ties to hook it to</p> <p>21 the post.</p> <p>22 Q. Um-hum.</p> <p>23 A. And some inmate came to me from UNICOR and said,</p> <p>24 hey, when we walk out of there, the ties are sticking out;</p> <p>25 they are right at eye level, and I almost poked my eye with</p>	<p style="text-align: right;">Page 43</p> <p>1 was reprinted, it came out with a new date?</p> <p>2 MR. GOLDRING: Right. It has the automatic date</p> <p>3 on it, so when it was printed, it automatically</p> <p>4 prints with today's date.</p> <p>5 MR. LANZILLO: Do we know the original date?</p> <p>6 MR. GOLDRING: It was April 21st, actually.</p> <p>7 MR. LANZILLO: Of '03.</p> <p>8 Q. With that correction -- and I thank counsel for</p> <p>9 that clarification -- have you ever seen Exhibit 2 prior to</p> <p>10 today, Mr. Housler?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. When is the first time you saw this</p> <p>13 document?</p> <p>14 A. I think I saw it when Mike was up at our</p> <p>15 institution, is the first time I saw it.</p> <p>16 Q. Did you see this document at any time in 2003?</p> <p>17 A. No. Not that I recall. I would have kept it in</p> <p>18 my file. It's not in my file.</p> <p>19 Q. Take a minute, if you would, and just review it to</p> <p>20 yourself, the substance, and I just want to ask you if you</p> <p>21 have any knowledge concerning the substance of the document.</p> <p>22 A. (Witness complies.) I really don't have a whole</p> <p>23 lot of knowledge on this documentation, no.</p> <p>24 Q. Let me just ask you one follow-up question or two</p> <p>25 follow-up questions here. There is a statement attributed</p>
<p style="text-align: right;">Page 42</p> <p>1 the end of the tie. So I said, okay, I'll go down and check</p> <p>2 it out, and he was right. So I twisted the ties around so</p> <p>3 they were pointing in, thus eliminating the inmate getting a</p> <p>4 chance of getting poked in the eye. That came from UNICOR.</p> <p>5 That's just a minor thing, but that's something.</p> <p>6 We're very proactive here in our -- in our safety</p> <p>7 program. If we get a complaint, we're going to check it</p> <p>8 out, and we're going to do whatever we have to, to correct</p> <p>9 it.</p> <p>10 (Discussion held off the record.)</p> <p>11 (Housler Deposition Exhibit 2</p> <p>12 marked for identification.)</p> <p>13 Q. Mr. Housler, I have handed you what we have marked</p> <p>14 as your Deposition Exhibit 2. It is a memo dated</p> <p>15 September 8, 2006 to Marty Sapko. Subject: Foreman Robin</p> <p>16 Bevevino; reply to Dave English.</p> <p>17 MR. COLVILLE: Let me just put an objection on the</p> <p>18 record with regard to the date of the memorandum.</p> <p>19 Just so we're -- I think there's an understanding</p> <p>20 that that is not the date this memorandum was</p> <p>21 prepared.</p> <p>22 MR. LANZILLO: You know, I was wondering about</p> <p>23 that.</p> <p>24 MR. GOLDRING: Yeah, what happened --</p> <p>25 MR. LANZILLO: Was it a typo, or was it when it</p>	<p style="text-align: right;">Page 44</p> <p>1 to Mr. Bevevino in the third paragraph of Exhibit 2 that</p> <p>2 states, "He," Bevevino, "said there is cancer-causing agents</p> <p>3 in the Micore board, and he is not going to tolerate it. He</p> <p>4 said, 'Just because I don't care about my health, he's not</p> <p>5 going to sit back and do nothing.' He then stated to me</p> <p>6 that --" well, it goes on.</p> <p>7 A. Um-hum.</p> <p>8 Q. Something about, "Stated to me that I have</p> <p>9 changed; what, did Debbie promise me a job where she was</p> <p>10 going, or what."</p> <p>11 A. I don't know anything about that; that job change</p> <p>12 or anything about where Debbie was going.</p> <p>13 Q. And what about the statements attributed to</p> <p>14 Mr. Bevevino regarding the Micore board? Did you have any</p> <p>15 knowledge of that?</p> <p>16 A. No. Mr. Bevevino never approached me as far as</p> <p>17 his concern with Micore board, if he did have a concern.</p> <p>18 Q. Did Mr. Sapko or Mr. English relate to you the</p> <p>19 substance of Mr. Bevevino's statements as recounted in</p> <p>20 Exhibit 2?</p> <p>21 A. No. I don't recall.</p> <p>22 Q. Not that you remember?</p> <p>23 A. Nope.</p> <p>24 MR. LANZILLO: Mr. Housler, those are all the</p> <p>25 questions I have. Thank you.</p>

<p style="text-align: right;">Page 45</p> <p>1 CROSS-EXAMINATION</p> <p>2 BY MR. GOLDRING:</p> <p>3</p> <p>4 Q. Just a couple of points for clarification,</p> <p>5 Mr. Housler. You testified that the factory at McKean no</p> <p>6 longer produces wood products and furniture; it now produces</p> <p>7 plastics.</p> <p>8 A. Correct.</p> <p>9 Q. Do you know the reason that that change occurred?</p> <p>10 A. I think because of the distance we had to</p> <p>11 transport the wood and stuff, and it was more feasible for</p> <p>12 us to move -- where they moved it was to Florida. So it was</p> <p>13 much more feasible to move the woodworking operation to a</p> <p>14 Florida area.</p> <p>15 Q. Do you know if that decision had anything to do</p> <p>16 with any health or safety concerns in the factory?</p> <p>17 A. No, absolutely not. There was no concerns as far</p> <p>18 as health, safety. It was strictly a business move</p> <p>19 conducted by the Bureau of Prisons and UNICOR.</p> <p>20 Q. And do you know who made that decision?</p> <p>21 A. It came from UNICOR higher-ups and people at our</p> <p>22 factory. I know that. I can't give you an exact name, no.</p> <p>23 Q. But safe to say it was not a decision that was</p> <p>24 made by the administration at the factory itself or the</p> <p>25 staff at the factory itself.</p>	<p style="text-align: right;">Page 47</p> <p>1 Q. Just as a clarification, did you also give that</p> <p>2 instruction to staff?</p> <p>3 A. Yeah, I give that to staff in -- when staff are</p> <p>4 first hired, we have a three-week class for staff. I make</p> <p>5 it very clear, if you have a problem, you get an injury,</p> <p>6 work-related injury, you need to report it to us</p> <p>7 immediately. And same with inmates. If they have an issue</p> <p>8 or a problem, they need to report it to me immediately.</p> <p>9 Once I investigate something, and if there's a</p> <p>10 problem, and I don't correct it, I tell them. I said, if</p> <p>11 it's not corrected, you can go to whoever you want then.</p> <p>12 Q. And was there a process in place or a program in</p> <p>13 place for staff to report any kind of a work-related injury</p> <p>14 to you?</p> <p>15 A. Yes. We have a -- a log, health hazard log in our</p> <p>16 office, where if there's any health hazards, any issues</p> <p>17 where a staff has, they can send us an e-mail, they can send</p> <p>18 us a memorandum, and we'll check it out. And we -- we have</p> <p>19 that log in our office for your review.</p> <p>20 Q. And have staff ever -- and not just in the UNICOR</p> <p>21 factory, but in the institution generally, have staff ever</p> <p>22 reported a work-related injury to you?</p> <p>23 A. Numerous, yes. I -- we get -- we average probably</p> <p>24 16 staff-related injuries a year, yes.</p> <p>25 Q. And were any of those staff members from the</p>
<p style="text-align: right;">Page 46</p> <p>1 A. At McKean?</p> <p>2 Q. Right.</p> <p>3 A. Absolutely not.</p> <p>4 Q. I wanted to ask you, there have been some comments</p> <p>5 made that inmates were using some kind of a pneumatic air</p> <p>6 system to blow dust off themselves or off some of the</p> <p>7 equipment. And you previously testified that you did not</p> <p>8 see any of that occurring. Is that correct?</p> <p>9 A. Well, I -- I -- they used -- I saw them using some</p> <p>10 dust [sic] underneath the equipment in hard-to-reach areas,</p> <p>11 yes, but as far as on top, no.</p> <p>12 Q. Okay. And not off of themselves?</p> <p>13 A. Nope.</p> <p>14 Q. If you had seen that occurring, what would you</p> <p>15 have done?</p> <p>16 A. I would have told them they need to quit doing</p> <p>17 that.</p> <p>18 Q. Okay. So this was not a practice which would have</p> <p>19 been approved by you as the safety manager.</p> <p>20 A. No.</p> <p>21 Q. And I wanted to ask you about the -- you testified</p> <p>22 that you instruct all of the inmates, if they have a health</p> <p>23 or safety concern, to immediately come to the safety office</p> <p>24 and report that concern.</p> <p>25 A. (Witness nods head.)</p>	<p style="text-align: right;">Page 48</p> <p>1 UNICOR factory?</p> <p>2 A. What period are you talking about?</p> <p>3 Q. Any period.</p> <p>4 A. Yeah. We've had -- we had one staff member injure</p> <p>5 a knee this year in UNICOR. So yes.</p> <p>6 Q. Okay. And of the staff from the UNICOR factory</p> <p>7 who have reported work-related injuries or complaints to</p> <p>8 you, did any of them relate to respiratory concerns or skin</p> <p>9 irritation or anything along those lines during the period</p> <p>10 of time that the UNICOR factory was working with Micore</p> <p>11 board?</p> <p>12 A. None. None whatsoever.</p> <p>13 Q. And I wanted to ask you a quick question about</p> <p>14 Mr. Bevevino.</p> <p>15 A. Um-hum.</p> <p>16 Q. You testified that he's currently on Workers'</p> <p>17 Compensation?</p> <p>18 A. Yes. He's been off some time.</p> <p>19 Q. What is the reason that he's on Workers'</p> <p>20 Compensation currently?</p> <p>21 A. He claimed a back injury.</p> <p>22 Q. Okay. And is that the only reason that he's ever</p> <p>23 been on Workers' Compensation?</p> <p>24 A. No. He's -- he's had numerous cases. He had a</p> <p>25 shoulder injury previous, another back injury. I can't</p>

12 (Pages 45 to 48)

<p style="text-align: right;">Page 49</p> <p>1 recall all the injuries he had, but his file is about six 2 inches thick. So he -- he's had a lot of injuries. 3 Q. And did any of the injuries that resulted in him 4 being in Workers' Comp., did any of them relate to 5 respiratory concerns or concerns relating to the Micore 6 board? 7 A. None whatsoever. I just want to say that when we 8 had our wood factory, I would put our wood factory, as far 9 as sanitation and cleanliness [sic], up against any 10 factory in the world. I mean, we have a captive audience 11 here, and we have all the labor we want, so our factory is 12 extremely clean. And there is no reason for it not to be 13 clean, because we -- if inmates aren't doing work, they are 14 cleaning down there. And if you compare our woodworking 15 factory, when we had the woodworking factory, to a factory 16 in the private sector, there's -- there is totally no -- 17 nothing to compare. You walk into a factory in the private 18 sector, there's dust piled up on the pipes, on the beams, on 19 the floor. You don't see that in our factory. Our factory 20 is highly sanitized. And I would bet my life on it; that 21 it's one of the cleanest -- was one of the cleanest 22 factories in the world. 23 Q. With that, let's talk about the OSHA inspection in 24 2003 for a minute. Did the OSHA inspectors themselves who 25 came in to look at the factory, did they make any verbal</p>	<p style="text-align: right;">Page 51</p> <p>1 (Housler Deposition Exhibit 3 2 marked for identification.) 3 Q. -- based on this document, what the levels of the 4 silica -- silica in the air were. 5 A. Okay. The -- the total that you read off the MSDS 6 is 15. If you take a look at the total particulate, it's 7 .54. Respirable silica on the saw operate [sic], it says 8 none detected. The feeder operator total particulate, 1.1. 9 The air sample, none detected for synthetic victarious [sic] 10 fiber. And when they did bulk samples for silica, it was 11 30 percent SVF and 20 percent silica. Router and shaper, 12 silica, none detected. Router and shaper operator, total 13 particulate, 1.50. Area sample, synthetic victarious [sic] 14 fibers, none detected. 15 Q. And are you familiar with what the allowable 16 levels of those particulates would be in the factory? 17 A. Yes. 18 Q. What would be allowed under OSHA regulations? 19 A. Anything under 15, permissible exposure limit, 20 off -- if you look at the Material Safety Data Sheet. 21 Q. And I want to turn to what was marked as Exhibit 22 1, which I believe was a section of the report that was 23 generated by OSHA. 24 A. I never saw this, just for the record. 25 Q. No, not this one.</p>
<p style="text-align: right;">Page 50</p> <p>1 comments to you about the quality of the air in the factory? 2 A. Well, the -- Mr. Clabaugh, who was the initial, 3 came in three times -- I think it was three times. I would 4 have to look at my -- he came in. He didn't make any 5 comments about it, but he did say we want to bring our 6 industrial hygienist in to do some air monitoring. So the 7 industrial hygienist came in -- let me see. They were in 8 June 17th and 18th doing the air monitoring. They were -- 9 spent the whole day the 17th. They came in the 18th, and 10 they did some -- they started doing some air monitoring. 11 They were doing some air monitoring. And the industrial 12 hygienist said, that's it, that's enough; I see no problems 13 here; we need to leave and finish this up and get out of 14 here. He said he saw no problems there. That was his 15 comment to me. 16 Q. Okay. And I'm going to show you -- this is -- can 17 you identify this document for me. 18 A. This is the document from OSHA; the results of the 19 air monitoring test. 20 MR. GOLDRING: You guys have that, right? 21 Q. And have you seen this document before? 22 A. Yeah, I have a copy of it right here (indicating). 23 Q. And can you tell me, based on that document -- 24 MR. GOLDRING: And we'll mark this -- I guess it 25 will be Exhibit 3.</p>	<p style="text-align: right;">Page 52</p> <p>1 MR. GOLDRING: Oh, you didn't enter that into 2 evidence. I'm sorry. That was not Exhibit 1. 3 Q. Mr. Lanzillo read from a part of the OSHA report. 4 I'm just going to flip to a page he was reading from. He 5 referred to OSHA, Citation No. 2, Items 1 and 3. And if you 6 could look at -- 7 MR. GOLDRING: And I guess this would be Exhibit 8 4, then. 9 (Housler Deposition Exhibit 4 10 marked for identification.) 11 Q. -- where it says Type of Violation, can you read 12 what it says there. 13 A. "Employees who wear --" 14 Q. No. Up where it says Type of Violation. 15 A. "Other". "Other". 16 Q. And are there different kinds of -- types of 17 violations that OSHA could come in and reference? 18 A. Yes. 19 Q. What else could have been written there? 20 A. Serious, willful. 21 Q. So the fact that that says "other", does that 22 imply to you that this was a nonserious violation? 23 A. Yes. 24 Q. What does that mean, if it was a nonserious 25 violation?</p>

Page 53

1 MR. LANZILLO: Objection to form on the last
2 question.
3 Q. What do you understand other to mean?
4 A. "Other" would mean that other -- that it may fall
5 under the general duty clause OSHA has. It may be just a
6 recommendation. They -- they may make a recommendation that
7 you do something to make the protection better than it is.
8 Q. Okay.
9 A. So that would fall under "other".
10 Q. Okay. Were any of the items noted by OSHA, were
11 any of them termed serious?
12 A. I -- I can't remember. I'd have to look.
13 Q. Were any of them termed anything other than other?
14 A. Yes.
15 Q. Okay.
16 A. Yes.
17 Q. And did any of those relate to the air quality in
18 the factory, if you remember?
19 A. I can't recall.
20 Q. Okay. When you testified about having Microbac
21 Labs come in -- and I just wanted to ask you about a
22 statement that you made -- you testified that it was a
23 struggle to have them come in, and eventually they -- they
24 agreed to have Microbac come in, and you testified that they
25 should have done that from the beginning.

Page 54

1 A. (Witness nods head.)
2 Q. What exactly did you mean, they should have done
3 that from the beginning?
4 A. When we received the complaint, the first initial
5 complaint, my recommendation was we immediately bring --
6 because you only have so many days to respond to the OSHA
7 citation or complaint. So I recommended we get them in
8 immediately to do the air monitoring so we could get the
9 results back and get them up to the OSHA office for our
10 response.
11 Q. Okay. So just to make sure I'm clear, what you
12 meant by that statement was that you should have had
13 Microbac come in as soon as the complaint was brought to
14 your attention.
15 A. Correct.
16 MR. GOLDRING: That's all I have.
17 MR. COLVILLE: Just a couple questions.
18
19 CROSS-EXAMINATION
20 BY MR. COLVILLE:
21
22 Q. You talked a lot about Micore board, and Lokweld
23 was mentioned. Did any inmate or staff member come to you
24 and tell you that they thought they were getting sick
25 because they were using or working around Lokweld?

Page 55

1 A. No.
2 MR. COLVILLE: That's all I have.
3 MR. LANZILLO: Just a couple of follow-up.
4
5 REDIRECT EXAMINATION
6 BY MR. LANZILLO:
7
8 Q. Regarding cleaning procedures, was there any
9 change in the procedures after the OSHA inspection?
10 A. OSHA made some recommendations. There was
11 approximately seven of them. And with the recommendation,
12 that doesn't mean you have to do it or you have to take
13 corrective action that they recommend. When they made the
14 recommendations, we -- we went ahead and we did what all
15 their recommendations were. I have them here. I can read
16 them to you, if you want me to.
17 Q. Well, I just was wondering in terms of the
18 cleaning procedure.
19 A. The cleanup? They recommended that we only use
20 Shop-Vacs for cleaning up. And they also recommended that
21 in order to make sure it was done properly, we don't do any
22 sweeping.
23 Q. And was -- was that change made?
24 A. Yes. All the recommendations they recommended, we
25 did.

Page 56

1 Q. In response to one of Mr. Goldring's questions,
2 you testified that if you had observed an inmate using a
3 pneumatic air pressure hose to blow dust off of clothing,
4 you would have prohibited that --
5 A. Yes.
6 Q. -- practice.
7 A. Yes.
8 Q. And why is that?
9 A. I think it's dangerous. You can blow something up
10 into your face, into your eye. If something gets -- would
11 be caught in the end of it, it could possibly blow through
12 their clothes, puncture their skin, or injure them.
13 Q. Were there any policies in place regarding that --
14 that type of action during your tenure as --
15 A. No.
16 Q. -- safety manager?
17 A. No.
18 Q. Between the date of the complaint, the first OSHA
19 complaint in 2001 and the OSHA inspection in April of 2003,
20 am I correct that you did not review the MSDS for Micore
21 board?
22 A. Correct.
23 MR. LANZILLO: That's all.
24
25 RECROSS-EXAMINATION

Page 57

1 BY MR. COLVILLE:

2

3 Q. About the recommendations that you mentioned, were
4 these -- it was my understanding these recommendations were
5 separate and aside from the citations listed in the formal
6 report by OSHA. Is that accurate?

7 A. Right. Correct.

8 Q. Now, these recommendations, are you required to
9 implement them?

10 A. No. They are just a recommendation.

11 Q. Why did you implement them, if they are not
12 required to be implemented?

13 A. Well, number one, coming from OSHA, when they --
14 when they -- when they recommend something, it's wise to
15 take their advice and do what they do [sic]. You know,
16 they -- they are the -- they are the experts, and they know
17 what they are doing.

18 Q. Okay. Now, with regard to the citation itself,
19 all of the citations, after you received these citations,
20 did you or did the prison take corrective actions on all or
21 some of the cited areas?

22 A. I -- I took corrective action. I had to review
23 them. I had to write a response to OSHA and send it in. So
24 I had to make sure all the corrective action was taken.

25 Q. Was there any citation that wasn't corrected --

Page 58

1 A. No.

2 Q. -- after the OSHA report?

3 A. No. They all were corrected. There was a couple
4 of them that we -- that took a little time to get corrected.
5 But when I sent a letter to OSHA, I identified those ones.
6 And once we corrected them, we notified them that they had
7 been corrected.

8 Q. Was there any area that OSHA may have cited and
9 you just disagreed with them; you said, you know what, they
10 are wrong, we're not going to do what they cited us for?

11 A. No. No. Anything they recommended or cited us
12 for, we -- we took corrective action.

13 Q. And how soon after are we talking?

14 A. Some of them were corrected immediately, as I
15 said. And others -- others, we had to do some -- for
16 instance, they recommended that on one of our -- our garbage
17 collectors, that we weld a top on it and hook the
18 dust-collecting system into that. That -- that took a few
19 days to get done. I can't remember what the other ones
20 were.

21 MR. COLVILLE: That's all I have. Thank you.

22 (Discussion held off the record.)

23 MR. COLVILLE: Signature waived.

24

25 (Deposition concluded at 11:37 a.m.)

15 (Pages 57 to 58)

<p>A</p> <p>about 7:20 9:22,23 10:5 11:6 14:12,14 14:16 15:19,24 21:25 22:11,24 23:10 26:25 28:1,2,5,7,9,11 29:12 38:3,7 42:22 44:4,8 44:11,12,13 46:21 48:2,13 49:1,23 50:1 50:5 53:20,21 54:22 57:3</p> <p>above 37:18</p> <p>absolutely 36:20 41:2 45:17 46:3</p> <p>accommodate 38:17</p> <p>accurate 21:11 57:6</p> <p>action 55:13 56:14 57:22,24 58:12</p> <p>actions 3:10 57:20</p> <p>actually 5:17 12:24 31:19 36:9 43:6</p> <p>addition 4:6</p> <p>administration 45:24</p> <p>advice 57:15</p> <p>advisory 32:1</p> <p>affirmative 4:9</p> <p>after 16:25 17:2 18:22 30:7 34:4 55:9 57:19 58:2,13</p> <p>again 17:20</p> <p>against 33:16 49:9</p> <p>agents 44:2</p> <p>ago 11:7</p> <p>agreed 53:24</p> <p>ahead 38:13 55:14</p> <p>air 7:2,4 19:7 22:8 27:8 27:9,12 32:15,18 33:1,3,7,8,14,17,23 34:15,17,19,24 36:15 36:23 37:14,17 46:5 50:1,6,8,10,11,19 51:4,9 53:17 54:8 56:3</p> <p>al 1:3,5</p> <p>allowable 51:15</p> <p>allowed 24:2 38:15 51:18</p> <p>almost 41:25</p> <p>along 27:22 29:25 48:9</p> <p>already 35:17</p> <p>always 12:14</p> <p>ambiguity 4:7</p> <p>Among 13:23 14:7</p> <p>amount 18:6,25 37:16</p> <p>amounts 14:22 28:17</p> <p>annual 21:4</p> <p>another 33:4,5 39:21 48:25</p> <p>answer 11:23 28:7</p>	<p>answers 4:2</p> <p>anybody 22:2</p> <p>anyone 22:22 34:1</p> <p>anything 7:3 23:8 38:2 41:15 44:11,12 45:15 48:9 51:19 53:13 58:11</p> <p>anytime 15:16</p> <p>anywhere 28:14</p> <p>Appendix 32:2</p> <p>apply 28:25</p> <p>approach 39:11</p> <p>approached 22:17,18 39:14 44:16</p> <p>approved 23:14,16 26:3 46:19</p> <p>approximately 7:20 12:16,21 39:4 55:11</p> <p>April 14:12 15:24 20:2 28:10 36:19 43:6 56:19</p> <p>area 18:24 28:15,20 29:12,16 30:11,23 31:11 38:8,14,16 45:14 51:13 58:8</p> <p>areas 13:24 27:8 34:23 38:6 46:10 57:21</p> <p>arm 40:23 41:3</p> <p>around 8:24 9:8 18:23 19:16 23:3 26:7 37:14 42:2 54:25</p> <p>arrive 20:22</p> <p>asbestos-related 8:19</p> <p>ascertain 30:18</p> <p>aside 8:8 9:14,19 57:5</p> <p>asked 40:5</p> <p>asking 35:9</p> <p>assist 6:7</p> <p>assistant 11:19,22</p> <p>associate 11:14 33:6 34:2</p> <p>associated 15:20 16:3,4 20:18 21:13,18 22:12 31:8</p> <p>assume 4:20 18:3 40:22</p> <p>assure 33:8</p> <p>attend 6:12 8:13,15,20 9:7 21:6</p> <p>attended 5:24 6:16 8:9 8:17,22 9:6</p> <p>attending 5:21</p> <p>attention 54:14</p> <p>Attorney 1:19</p> <p>attributed 43:25 44:13</p> <p>audience 49:10</p> <p>AUSA 1:18</p> <p>authored 35:21</p> <p>autoimmune 16:15</p> <p>automatic 43:2</p> <p>automatically 43:3</p>	<p>available 20:8 24:16 25:3,4,5,15 26:16</p> <p>average 47:23</p> <p>avoid 25:22,23</p> <p>aware 19:24 31:4,6,8 31:13,13</p> <p>away 36:16</p> <p>a.m 1:10 35:16,16 58:25</p> <p>B</p> <p>Bachelor 5:8,18</p> <p>back 12:15 24:10,17,23 40:1,14 44:5 48:21 48:25 54:9</p> <p>based 50:23 51:3</p> <p>basic 32:1</p> <p>basically 23:22</p> <p>battle 33:9</p> <p>beams 49:18</p> <p>became 9:3</p> <p>become 12:23 25:4</p> <p>before 1:9 3:16,18,24 7:15 13:10 50:21</p> <p>beginning 20:1 34:16 53:25 54:3</p> <p>behavior 13:13,17</p> <p>being 6:23 36:9,9,14 49:4</p> <p>believe 36:17 38:22 51:22</p> <p>best 33:13</p> <p>bet 49:20</p> <p>better 53:7</p> <p>Between 56:18</p> <p>Bevevino 22:16,17,18 22:21,23 23:10 42:16 44:1,2,14,16 48:14</p> <p>Bevevino's 44:19</p> <p>Billisits 34:3</p> <p>blow 46:6 56:3,9,11</p> <p>blowing 19:6</p> <p>board 14:8,14 15:21 16:1,23 17:4,16,18 17:24 18:2,5,14,15 18:16 19:20 20:5,13 20:19 21:13,18 22:1 22:3,8,13,20,25 23:11,19 27:2 28:13 30:14 31:21 36:8 38:24 40:4,18 44:3 44:14,17 48:11 49:6 54:22 56:21</p> <p>booth 28:12,21 29:8</p> <p>BOP 36:13</p> <p>both 4:1,20 10:15</p> <p>box 40:11</p> <p>boy 34:20</p> <p>Bradford 5:2 6:11,12 7:25 8:2</p>	<p>branch 7:25</p> <p>breaks 41:3</p> <p>Brief 26:12</p> <p>bring 50:5 54:5</p> <p>broken 40:23</p> <p>brooms 38:10,11</p> <p>brought 54:13</p> <p>brush 27:6 28:18,18 29:1,2 38:4,5</p> <p>bulk 51:10</p> <p>Bureau 8:12 9:2,14,16 45:19</p> <p>business 5:5,9 6:6,8,9 45:18</p> <p>Butte 5:7,15</p> <p>buttoned 25:20</p> <p>buy 37:15</p> <p>B.S 5:5</p> <p>C</p> <p>C 1:18</p> <p>cabinet 29:11,14</p> <p>cabinets 31:7</p> <p>cable 41:20</p> <p>cables 41:20</p> <p>call 12:25</p> <p>called 13:3</p> <p>came 22:7,14 23:1 27:16 28:2 33:1 41:23 42:4 43:1 45:21 49:25 50:3,4,7 50:9</p> <p>campus 7:25 8:7</p> <p>cancer-causing 44:2</p> <p>cans 29:6</p> <p>captive 49:10</p> <p>carcinogen 16:8</p> <p>care 18:9 39:1 44:4</p> <p>cases 48:24</p> <p>caught 25:23 40:25 56:11</p> <p>cause 16:12,14,17</p> <p>caused 17:18</p> <p>cells 24:7,11</p> <p>center 9:12,12</p> <p>certain 39:13</p> <p>CFR 30:21 32:2</p> <p>chance 42:4</p> <p>change 44:11 45:9 55:9 55:23</p> <p>changed 12:9 44:9</p> <p>changing 11:1</p> <p>check 39:13 40:12,15 41:4 42:1,7 47:18</p> <p>checked 22:9 40:4</p> <p>chemicals 30:10,13,16 30:19</p> <p>Cherry 11:11</p> <p>choice 20:16 24:4</p> <p>chronic 40:19</p>	<p>Cindy 34:2</p> <p>circulating 36:12</p> <p>citation 30:8,20 31:24 52:5 54:7 57:18,25</p> <p>citations 30:7 31:23 32:10 57:5,19,19</p> <p>cited 32:5 57:21 58:8 58:10,11</p> <p>Clabaugh 50:2</p> <p>claimed 48:21</p> <p>clarification 43:9 45:4 47:1</p> <p>class 8:12,15 9:1,5,6,7 9:9,10 20:22,23 47:4</p> <p>classes 6:25 8:17,17,18 8:21 9:14</p> <p>clause 53:5</p> <p>clean 49:12,13</p> <p>cleaned 27:3,17 38:4</p> <p>cleanest 49:21,21</p> <p>cleaning 49:14 55:8,18 55:20</p> <p>cleanseliness 49:9</p> <p>cleanup 26:25 36:15 38:3 55:19</p> <p>clear 4:4 22:3 47:5 54:11</p> <p>clearly 4:17</p> <p>clothes 23:22 24:8,12 24:21 26:17,22 56:12</p> <p>clothing 19:1 23:18 26:14,23 56:3</p> <p>CNC 27:15 34:22</p> <p>CNN 34:22</p> <p>collect 18:10 37:19</p> <p>collected 37:7</p> <p>collecting 37:3 39:19</p> <p>collection 19:21 20:7 33:24 36:12 37:20 38:5</p> <p>collectors 58:17</p> <p>collects 18:10</p> <p>college 5:6,15,25 6:1,16 7:18,24 8:9</p> <p>Colville 1:18 2:6,8 42:17 54:17,20 55:2 57:1 58:21,23</p> <p>come 6:6,6 22:9 24:6 32:17 40:8 46:23 52:17 53:21,23,24 54:13,23</p> <p>Comfort 32:5</p> <p>coming 57:13</p> <p>command 8:18</p> <p>commenced 14:12</p> <p>commencement 15:23</p> <p>commencing 1:10</p> <p>comment 50:15</p> <p>comments 46:4 50:1,5</p> <p>Commonwealth 1:10</p>
---	---	--	---	---

<p>communication 30:12 30:15 commuting 7:24 Comp 49:4 compare 49:14,17 compensation 8:18 10:14 22:20 39:22 48:17,20,23 complain 21:25 complained 27:25 complaining 36:14 complaint 22:2 33:4,5 41:16,17 42:7 54:4,5 54:7,13 56:18,19 complaints 17:2 48:7 complete 6:2 40:14 compliance 30:24 36:5 compliant 34:12 complies 43:22 composition 14:23 concern 44:17,17 46:23 46:24 concerning 22:3 43:21 concerns 21:25 22:12 22:24 23:10 45:16,17 48:8 49:5,5 concluded 58:25 conditions 3:13 conduct 10:11 conducted 34:18 45:19 congested 36:14 connected 27:17 consideration 13:18 considerations 13:12 considered 13:9 23:15 constituent 14:23 construction 41:18 contact 22:5 34:12 contained 32:1 container 29:18 containers 29:6 convenience 14:10 convinced 33:16 copy 50:22 cop-out 12:25 correct 5:20 10:20,22 14:8 21:10,14,19,23 22:7 24:9 42:8 45:8 46:8 47:10 54:15 56:20,22 57:7 corrected 19:23 47:11 57:25 58:3,4,6,7,14 correction 43:8 correctional 7:13 corrections 7:15 corrective 55:13 57:20 57:22,24 58:12 counsel 35:5 43:8 County 7:16,19 couple 3:16 17:2 41:11</p>	<p>45:4 54:17 55:3 58:3 course 14:1 courses 6:22 court 1:1 4:3 coveralls 24:15 25:2,3 25:4,7,9,14 covered 6:19,25 create 14:15,21,22 created 15:20,25 22:24 crescent 37:21 Cross-examination 2:5 2:6 45:1 54:19 CRR 1:24 cubic 37:8,11,14,17 cups 11:3 current 9:24 currently 11:11,19 48:16,20 cut 19:19 cutting 15:13,17,20 16:1 17:23,24 18:1 20:4,18 22:24 23:10 C.A 1:3,3,4,4,5</p> <hr/> <p style="text-align: center;">D</p> <p>D 2:1 32:2 dangerous 56:9 Data 14:17 51:20 date 32:20 42:18,20 43:1,2,4,5 56:18 dated 42:14 Dave 42:16 day 39:9 50:9 days 54:6 58:19 DC 1:22 dealings 22:18 dealt 22:21 Debbie 44:9,12 debris 36:16 December 1:10 decision 25:10,12 45:15,20,23 Defendants 1:6,18 degree 5:9,18,22,23 Denver 9:10,11 department 9:4 11:25 34:13 departments 28:17 depo 3:21 deposition 1:9 2:11,12 2:13,14 3:12,18,25 35:3,6 42:11,14 51:1 52:9 58:25 described 19:18 description/location 36:7 detail 26:20 details 14:2 26:24 detected 51:8,9,12,14 different 12:8 20:24</p>	<p>21:5 34:20,23 52:16 dinner 39:16 dip 29:4,5 direct 2:4 3:4 14:11 disagree 36:21 37:25 disagreed 58:9 discretion 13:5 discussed 6:25 Discussion 26:10 35:1 35:15 42:10 58:22 diseases 16:15 distance 45:10 DISTRICT 1:1,1 document 35:2,8,18,22 43:13,16,21 50:17,18 50:21,23 51:3 documentation 23:1,7 43:23 doing 33:25 37:8,24 41:17 46:16 49:13 50:8,10,11 57:17 done 3:22 26:20 29:13 33:7,9,12 34:16 46:15 53:25 54:2 55:21 58:19 door 41:18 Douglas 1:21 down 13:1,4 19:13,14 19:15 23:2,5,5 25:5 26:1 27:16,22 31:3 38:21 39:2,8,11,13 40:3,4 41:4,11 42:1 49:14 draw 37:17 drawing 37:11 drum 29:16 drums 29:10 dryers 26:16 duly 3:2 during 48:9 56:14 dust 6:18 7:3,6 14:16 14:21,22,24 15:1,7,8 15:10,14,16,20,25 16:7,12,14,17 18:6,7 18:9,10,16,18,23 19:1,6,9,19,21 20:7,8 20:10 23:13,15 27:1 27:3,5,6,18 33:24 36:12,12 37:4,19,20 38:5 39:18 46:6,10 49:18 56:3 dust-collecting 18:18 19:24 27:14 37:3,6,6 58:18 duty 53:5 dysfunction 16:20</p> <hr/> <p style="text-align: center;">E</p> <p>E 2:1 3:1,1,1,1 each 32:11</p>	<p>education 5:4 7:14 8:10 effective 30:18 effects 15:25 eliminating 42:3 Employee 30:9 Employees 31:24 52:13 employment 9:24 13:2 encouraged 25:9 end 27:3 42:1 56:11 engineering 5:23 English 42:16 44:18 enough 4:21,22 50:12 ensure 4:4,7 enter 52:1 environment 10:19 23:6 EPA 10:11 equipment 11:8,9 14:1 14:2,3 25:22,23 34:21 37:5,5,15,18 37:19 38:6 46:7,10 Erie 1:3,3,4,4,5,11,17 Esquire 1:15,18,21 et 1:3,5 Eugene 4:25 evaluation 40:9 even 23:9 eventually 53:23 ever 19:6,9,17 21:24 22:7,11,14,15,22 23:9 28:2 29:19 35:9 38:24 40:17 41:7,13 43:9 47:20,21 48:22 every 8:14 21:4 37:5 39:9 everybody 9:5 everything 11:8 evidence 52:2 exact 8:25 32:20 45:22 exactly 54:2 examination 2:4,7 3:4 55:5 Examining 35:17 example 14:20 22:16 executive 11:19,22 Exhibit 2:11,12,13,14 35:3,6,9,13,17 36:18 42:11,14 43:9 44:1 44:20 50:25 51:1,21 52:2,7,9 EXHIBITS 2:10 existed 3:14 experience 13:8,11 14:4 experts 57:16 explanation 25:13 expose 23:4 exposed 6:23,24 30:12 exposure 6:18,20 51:19</p>	<p>express 22:22 extent 5:4 27:1 extremely 49:12 eye 38:19,22 41:15,25 41:25 42:4 56:10 eyes 36:14 38:20 e-mail 34:5,9 47:17</p> <hr/> <p style="text-align: center;">F</p> <p>face 56:10 facilities 13:9 facility 3:14 10:19,21 10:23 11:4 12:17,24 13:24 19:12 20:2 21:3,16 23:18 26:14 26:22 32:16 39:7 fact 18:22 52:21 factories 49:22 factors 13:13 factory 10:25 11:1 14:4 17:11 19:13 20:6 23:2 29:25 30:2 33:6 33:15 34:24 36:8,13 38:15,16 45:5,16,22 45:24,25 47:21 48:1 48:6,10 49:8,8,10,11 49:15,15,15,17,19,19 49:25 50:1 51:16 53:18 Factory/Respirator 32:3 fair 4:21,22 10:17 31:15 32:11 fall 53:4,9 fallen 32:12 familiar 3:19 7:6 51:15 far 6:23 11:7 21:8 22:19 26:21 38:19 44:16 45:17 46:11 49:8 father 6:5 fault 4:15 FCI 3:15 7:5,8 10:2,8 10:23 11:4,16 12:20 30:11,23 feasible 45:11,13 Federal 1:21 30:21 feed 39:9,16 feeder 51:8 feet 37:8,11,14,17 felt 33:24,24 34:7,9 fence 41:19,19 Ferguson 1:9,24,25 few 58:18 fiber 15:1 51:10 fibers 51:14 file 43:18,18 49:1 fills 40:1 filtered 27:23 final 11:7</p>
---	--	--	---	--

finally 33:15 34:15 fine 33:23 finger 40:24 finish 50:13 fire-related 8:16 firm 33:11,13,13 first 1:22 3:1,21 20:22 29:21,23 35:12 43:12 43:15 47:4 54:4 56:18 five 8:13 37:9,10 five-week 8:12 9:1,5 flammable 29:11,14 31:5,7 flip 52:4 floor 19:12 27:7 38:10 49:19 Florida 45:12,14 follows 3:2 follow-up 43:24,25 55:3 foolish 34:14 force 25:11 foreman 30:25 31:1,2,4 42:15 foremens 20:20 form 53:1 formal 57:5 Forsyth 33:20 Forsyth's 34:4 forth 11:9 four 23:2 fracture 14:20 frame 12:15 from 5:11,16,18 6:10 6:14 8:8 9:2,14,19,19 13:8 17:3 19:19 22:2 22:15 23:8 24:7 26:23 28:8,9 30:19 33:4,5 34:16 35:16 36:5 39:12 40:2,3,8 40:17 41:9,17,23 42:4 45:21 47:25 48:6 50:18 52:3,4 53:25 54:3 57:5,13 full 4:23 functioned 19:21,25 functioning 19:17 furnish 36:10 furnished 36:9,10 furniture 10:24,25 11:5 45:6 further 8:10 30:11	27:1 51:23 gets 56:10 getting 25:23 39:12 42:3,4 54:24 give 45:22 47:1,3 given 20:10 glasses 26:1,2,6 glue 28:12,25 31:8 gluing 28:13,19 go 8:5 18:16 19:13 24:10,23 32:10 38:13 38:16 39:13,23 41:4 42:1 47:11 goes 9:5 19:15 32:2 44:6 goggles 25:25 26:4,5 going 4:8,10 7:17 23:4 23:6 41:4,5 42:7,8 44:3,5,10,12 50:16 52:4 58:10 Goldring 1:21 2:5 42:24 43:2,6 45:2 50:20,24 52:1,7 54:16 Goldring's 56:1 good 3:7,8 4:23 13:17 39:8 Gornall 1:11,16 graduate 5:11 6:14 Grant 1:19 ground 3:17 guess 50:24 52:7 guys 38:23 50:20	30:10,16,20 39:23 40:2,8,9,17,23 44:4 45:16,18 46:22 47:15 47:16 healthful 10:18 hear 4:17 22:11 28:4,7 28:9 heard 4:20 held 9:10,13 10:3 11:15 26:10 35:1,15,16 42:10 58:22 her 11:20 34:5,8,9,9 hey 39:11 41:24 high 6:12,14 higher 13:24,25 higher-ups 45:21 highly 13:25 49:20 Hill 1:3 3:10,11 him 6:7 49:3 hired 9:4 13:10 21:1 47:4 Hold 38:9 holding 26:2 Holdnack 1:25 home 6:6,6 hook 41:20 58:17 hooked 37:5,9,10 hose 27:8 56:3 hoses 27:9,16 36:16 38:5 hotter 24:3 hour 39:8,10 housing 26:16 Housler 1:9 2:3,11,12 2:13,14 3:7 4:25 5:1 24:5 26:13 35:2,6,17 42:11,13 43:10 44:24 45:5 51:1 52:9 huh-uh 4:11 Hum-um 15:2 16:9 hygienist 6:22 50:6,7 50:12	inches 49:2 Incident 8:18 include 10:21 17:13 30:9,15 included 15:1,8,10 30:13 indicate 23:9 indicated 5:13 9:2 35:18 indicating 40:18 50:22 indirectly 22:11 individuals 12:13 21:17 industrial 6:22 50:6,7 50:11 industries 1:21 33:18 influence 13:14 information 30:18 32:1 32:4 34:10,11 initial 7:12 20:21 21:1 39:24 40:8 50:2 54:4 initially 8:12 injure 48:4 56:12 injured 40:25 injuries 22:20 41:11,14 47:24 48:7 49:1,2,3 injury 39:21,22,24 40:8 40:10 41:8 47:5,6,13 47:22 48:21,25,25 inmate 12:19,23 13:14 18:11 19:2 21:24 25:14 26:20 39:10,13 40:2,9,19 41:17,23 42:3 54:23 56:2 inmates 3:14 10:16,19 12:16 14:7 19:6,11 20:8,12,17,22,24 21:12 22:4 23:5,22 24:2,5,15 25:6 26:17 26:19,23 27:25 28:2 30:4 31:9,10,15 36:11,13,14 38:15 39:9,21 46:5,22 47:7 49:13 inmate's 13:13 inspection 14:11,13 15:18,24 17:7,20 18:2 20:1 21:22 28:10 30:8 32:15 36:6 49:23 55:9 56:19 inspections 10:12 inspectors 49:24 instance 58:16 institution 5:24 12:22 26:18 28:16 38:18 43:15 47:21 institutions 12:22 instruct 46:22 instructed 20:12	instruction 47:2 intended 6:17 interruption 26:12 investigate 22:6 47:9 investigated 41:12,13 investigation 41:3,6 involved 7:3 involving 17:23 27:2 in-house 9:20 21:8 irritated 38:20 irritation 16:18 28:1 36:13 38:19,20,22,23 39:12 40:3,19 41:14 41:14,15 48:9 irritations 28:3 issue 22:7,19 36:24 39:1 40:6,15 47:7 issued 30:7 issues 6:5 14:18 19:23 20:24 21:5 32:12 47:16 item 30:8 31:24 32:6 items 11:3 52:5 53:10
J				
J 1:5 Jail 7:16,19 Janis 1:9,24 4:2 job 33:25 37:24 44:9 44:11 jobs 13:23 JOHN 1:5 July 7:11 33:1 June 50:8 just 3:16 7:4 9:23 10:14 13:3,6 14:10 24:17 24:18 27:24 32:4 33:11 37:2 42:5,17 42:19 43:19,20,24 44:4 45:4 47:1,20 49:7 51:24 52:4 53:5 53:21 54:11,17 55:3 55:17 57:10 58:9				
K				
Kelly 3:11 Kenny 3:11 kept 43:17 Kevin 3:11 khaki 23:22,23 kind 46:5 47:13 kinds 52:16 knee 48:5 knew 14:15,19 18:5,20 31:6 know 4:10,17 14:13,16 14:23 15:1,7,10,13 15:19,24 16:2,3,4,7 16:12,14,17 22:5 23:13 27:23 28:11				

36:2 39:1,18,19 40:23 42:22 43:5 44:11 45:9,15,20,22 57:15,16 58:9 knowledge 27:25 31:18 35:21 43:21,23 44:15 known 14:8 Knox 1:11,16	30:5,14 31:5,8,21 54:22,25 long 7:19 10:3 11:15 13:2 39:6 longer 10:24,25 45:6 long-sleeved 23:23 25:17 look 32:22 34:14 49:25 50:4 51:6,20 52:6 53:12 loose 25:21 lost 37:21 lot 14:16 43:23 49:2 54:22 lower 34:13 lunch 39:16	maybe 38:24 McKean 3:15 7:5,8 10:2,8,24 11:4,16 12:20 30:11,23 45:5 46:1 McLaughlin 1:11,16 mean 6:24 7:1 39:1 40:22 41:3 49:10 52:24 53:3,4 54:2 55:12 meant 36:10 54:12 measures 30:19 37:22 meet 34:7 member 13:1 21:24 39:3 48:4 54:23 members 11:24 23:9 47:25 memo 42:14 memorandum 42:18,20 47:18 memory 9:19 mentioned 22:14 23:7 23:13 24:5 38:3 54:23 57:3 Michael 1:3,18 3:10 Micore 14:8,14 15:21 16:1,22 17:4,16,18 17:24 18:2,5,14,15 18:15 19:20 20:5,13 20:19 21:13,18 22:1 22:3,8,12,19,25 23:10,19 27:2 30:14 31:21 36:8 38:23 40:4,18 44:3,14,17 48:10 49:5 54:22 56:20 Microbac 32:17 34:17 53:20,24 54:13 might 8:24 13:13 32:24 33:9 Mike 43:14 mineral 5:6 15:1 minimal 37:16 minor 42:5 minute 37:8,11 38:22 43:19 49:24 Miss 34:4 money 33:23 Monica 11:18 monitored 19:22 monitoring 7:2,4 10:9 10:14 22:9 32:18 33:1,7 34:15,17 50:6 50:8,10,11,19 54:8 monitors 19:16 Montana 5:6,7,16,17 5:21,25 6:1,16 8:9 monthlies 10:13 months 11:7 more 18:14 24:3 39:8	45:11,13 morning 3:7,8 most 4:13 13:22 move 45:12,13,18 moved 45:12 moving 11:8 MSDS 16:22,25 17:4,9 17:13,15 21:21 29:19 29:21 51:5 56:20 much 24:3 29:25 45:13 Myron 3:11 myself 23:4 30:25 34:14 40:25	O O 3:1 20:22 22:4 Oakland 8:6 objection 42:17 53:1 observe 18:22 19:4,5 observed 17:23 18:1 56:2 obviously 14:21 occur 32:19 occurred 45:9 occurring 46:8,14 occurs 36:15 off 19:6 26:10 27:6,13 27:18 35:1,15 42:10 46:6,6,12 48:18 51:5 51:20 56:3 58:22 office 1:19 17:10 46:23 47:16,19 54:9 officer 7:13 9:3 34:12 36:5 offices 1:11 often 19:11 Oh 3:21 29:17 34:20 52:1 oil 6:9 okay 3:21,23 6:21 8:1,3 18:20 24:20 38:2 42:1 43:12 46:12,18 48:6,22 50:16 51:5 53:8,10,15,20 54:11 57:18 once 47:9 58:6 one 3:22 4:8,14 12:2,8 13:24 18:14 19:15 20:9,10 22:7 26:22 32:11 33:5 34:6 36:11,22 37:1,9,10 37:11,13 38:1,22 39:2,13 40:12 41:17 43:24 48:4 49:21,21 51:25 56:1 57:13 58:16 ones 10:12 29:8 41:14 58:5,19 only 48:22 54:6 55:19 onto 28:13 open 29:16 30:2 opened 29:25 operate 14:1 51:7 operating 14:2,3 operation 18:23,24 45:13 operations 11:14 17:23 17:24 18:2 27:2 33:7 37:4 operator 15:15 51:8,12 oppose 34:1 opposed 4:6 17:17 33:17 34:3,5
L L 1:9,24 3:1 labor 49:11 Laboratories 32:17 Labs 53:21 LAMANNA 1:5 lamine 28:13 Lane 5:2 Lanzillo 1:15 2:4,7 3:5 3:9 35:4 42:22,25 43:5,7 44:24 52:3 53:1 55:3,6 56:23 large 29:6 34:21 last 53:1 launder 26:17,22 laundry 26:11,15,18,18 26:18,19 lead 8:19 learn 22:15 learning 14:1 least 19:13 21:21,22 23:2 39:5 40:25 leave 6:4 24:10,20 38:15 50:13 lecture 20:23 left 37:12,13 Leslie 3:10 lessons 22:4 let 4:17 8:18 14:10,12 22:5 24:17 26:25 37:2 38:9 39:17 42:17 43:24 50:7 letter 58:5 let's 12:4 18:11 49:23 level 41:25 levels 51:3,16 life 49:20 like 7:3,3 10:10 27:19 29:18 34:14 41:14 limit 51:19 limited 30:14 lines 27:9 48:9 list 13:2,2,7 listed 57:5 little 27:6 34:3 37:13 58:4 live 5:1,2 lived 8:4 log 47:15,15,19 Lokweld 28:11,11,12 28:25 29:7,19,22	M machine 40:24 41:4 machinery 27:15 34:21 machines 19:19 20:21 27:5,7,15 37:9 made 45:20,24 46:5 53:22 55:10,13,23 main 8:7 12:21 41:18 mainline 39:9,15,16 maintain 17:11 maintained 17:9,10 31:7 maintenance 19:22 Majority 18:18 make 10:10 19:15 22:3 24:18 31:13 34:13 35:4 47:4 49:25 50:4 53:6,7 54:11 55:21 57:24 making 10:24 11:5 man 19:22 management 5:5,9 manager 10:2,8 17:12 33:6 46:19 56:16 mandatory 26:1 39:10 mangled 40:24 manufacturer 37:16 manufacturing 11:2 many 12:16 16:2 54:6 mark 35:3 50:24 marked 35:7 42:12,13 51:2,21 52:10 Marty 42:15 mask 20:11,12,15 23:13,15 32:5 masks 20:4,8 material 8:17,20 14:17 14:19,21 51:20 materials 14:7,8 16:7 21:8 matter 6:24 13:6 may 9:16 12:9 53:4,5,6 58:8	N N 2:1 3:1 name 3:9 4:23 5:24 45:22 named 9:17 narrative 35:12 36:1 36:18 nature 6:8 41:15 necessarily 21:20 need 3:17 22:5 37:17 46:16 47:6,8 50:13 needed 28:17 30:19 33:15 34:7 negative 4:10 never 3:22,24 6:7 19:24 22:2,17,18 35:11 38:20 39:20 41:16 44:16 51:24 new 8:14,22 43:1 nine 11:7 NIOSH 23:14,16 nobody 22:14 38:24 nodding 4:6 nods 24:24 46:25 54:1 none 26:24 27:25 48:12 48:12 49:7 51:8,9,12 51:14 nonserious 52:22,24 nonsmoking 38:18 nontraumatic 41:13 nonwork 40:12 nonwork-related 40:10 Nookside 5:2 Nope 44:23 46:13 Notary 1:9 noted 32:4,9 53:10 notes 32:22,24 nothing 44:5 49:17 notified 58:6 nuisance 20:8,10 23:15 number 32:9 36:22 37:1,25 38:3 57:13 numerous 8:16 47:23 48:24 NW 1:22 nylon 41:20		

<p> opposition 33:12 option 25:2 order 13:6 55:21 original 43:5 originally 6:10 OSHA 10:10 14:11,13 15:18,23 17:3,20 18:2 20:1 21:22 28:10 30:7 31:23 32:10,15 33:4,5 34:6 34:11,12 35:9 36:5 49:23,24 50:18 51:18 51:23 52:3,5,17 53:5 53:10 54:6,9 55:9,10 56:18,19 57:6,13,23 58:2,5,8 OSHA's 17:7 other 8:14,16 9:21,21 12:3 13:8,9,13 14:1 19:19 22:17 23:4,4 24:6,7 25:14 27:2 28:5,8,9 32:21 37:10 37:13 52:15,15,21 53:3,4,4,9,13,13 58:19 others 58:15,15 out 5:15 7:13 11:8,8,9 20:8 22:10 38:16 40:1,4,16 41:4,18,24 41:24 42:2,8 43:1 47:18 50:13 outside 28:21 over 7:16 11:1 36:12 37:13 overall 10:15 12:19 34:24 own 26:17,19 </p> <hr/> <p style="text-align: center;">P</p> <hr/> <p> P 3:1 PA 1:17,20 page 2:11,12,13,14 35:13 52:4 paint 29:2 pants 23:23 paperwork 40:13 paragraph 44:1 part 12:23 30:7 31:23 52:3 particle 28:13 particular 5:22 particulate 51:6,8,13 particulates 51:16 parts 14:24 24:7 36:21 part-time 7:17,21,22 pay 13:21 PC 1:16 Pennsylvania 1:1,10,11 5:2 6:11 people 45:21 </p>	<p> per 37:8,11,17 percent 51:11,11 performed 32:16 34:17 period 14:11 48:2,3,9 periodically 27:3 Perlite 6:18 15:10 permissible 51:19 person 10:17 19:2 personal 31:18 Personally 14:14,15 personnel 12:9 30:12 30:17 32:3,5 photocopies 35:4 physical 30:10,16,20 pictures 41:5 piece 18:14 25:23 27:15 28:18 37:5,15 37:17 38:6 pieces 18:15 34:21 37:4 37:19 piled 49:18 piles 38:12 pipes 49:18 Pitt 5:11 Pittsburgh 1:20 5:10 5:19 8:2,6 Pitt-Bradford 8:1 place 20:3,3 23:17 26:13 47:12,13 56:13 placed 13:1 Plaintiff 1:3 Plaintiffs 1:15 3:10,14 plastic 11:2,2 plastics 11:1 45:7 Plus 39:8 pneumatic 19:7 46:5 56:3 point 37:4 pointing 42:3 points 45:4 poked 41:25 42:4 policies 20:3 26:25 56:13 policy 10:10,11,11 23:17 27:9 33:8 population 12:19 position 7:12 9:25 10:3 11:13,15,20 12:2,3 13:6,14,21 positions 12:1 13:20 Possible 19:3 possibly 56:11 post 41:21 potential 15:19,25 16:8 20:18 21:12,17 22:12 potentially 30:12 pounds 27:10,11 power 36:8 practice 46:18 56:6 predates 5:18 </p>	<p> prepared 42:21 present 19:11 pressure 19:7 56:3 presume 3:17 pretty 13:2 29:25 previous 48:25 previously 46:7 primarily 3:13 principal 21:7 principally 10:18 printed 43:3 prints 43:4 prior 7:17 11:17,18 13:8,10 14:4,11,13 15:18,23 17:5,20 18:2 20:1 21:22 28:10 32:15 33:2 35:9,18 43:9 priority 13:9 prison 1:21 9:20 13:23 24:7 57:20 Prisons 8:12 9:2,14,16 45:19 private 49:16,17 proactive 42:6 probably 3:18 11:6 12:18 36:5 47:23 problem 22:4,6,7,8 39:10,11 40:20 47:5 47:8,10 problems 19:17,24 21:25 22:12,16 28:1 28:3 50:12,14 procedure 4:1 23:17 55:18 procedures 20:3 21:8 26:11,13 27:1 55:8,9 proceedings 26:12 process 3:19 11:1 47:12 processing 36:8 produced 35:8 produces 45:6,6 product 30:5 products 45:6 program 6:2,4 8:11 10:14 12:24 30:12,15 32:3 39:22 42:7 47:12 programs 9:15 10:10 prohibited 56:4 project 39:13 projects 28:15,16,20 29:12,15 promise 44:9 prompted 33:3 proper 23:18 properly 19:25 31:7 55:21 protect 30:19 </p>	<p> protection 53:7 prove 33:14 34:7 provide 21:12,16 30:4 31:15,17,19 provided 20:17 25:13 25:25 30:18 31:25 36:18 providing 10:18 PSI 27:10 Public 1:9 pull 26:7 pun 6:17 puncture 56:12 purposes 26:15 push 18:15 36:16 38:11 put 41:19 42:17 49:8 P-E-R-L-I-T-E 15:11 P.C 1:11 </p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p> quality 32:15 33:8,14 33:23 34:8,25 36:23 50:1 53:17 question 4:15,18,19 30:22 36:17 43:24 48:13 53:2 questions 3:13 4:2,9,14 43:25 44:25 54:17 56:1 quick 48:13 quicker 13:17 quickly 13:14 quit 38:18 46:16 quite 4:1 32:9 quote 30:9,11 31:24 </p> <hr/> <p style="text-align: center;">R</p> <hr/> <p> R 3:1 raised 22:23 23:10 ran 12:18 Rather 32:10 rating 37:7 read 16:22 29:19,21 39:17 51:5 52:3,11 55:15 reading 34:24 52:4 real 33:11 really 4:1 7:2 8:24 14:18 16:2 17:17,18 31:2,3 33:22 43:22 reason 17:15 36:17 45:9 48:19,22 49:12 recall 7:1 8:25 43:17 44:21 49:1 53:19 receive 5:8 32:3 41:17 received 8:8 9:1,15,20 9:21 22:2 31:10 40:17 41:7 54:4 57:19 receiving 36:13 </p>	<p> Recess 35:16 recognize 35:19 recommend 55:13 57:14 recommendation 53:6 53:6 54:5 55:11 57:10 recommendations 55:10,14,15,24 57:3 57:4,8 recommended 33:5 54:7 55:19,20,24 58:11,16 record 4:12,24 26:10 35:1,15 42:10,18 51:24 58:22 recounted 44:19 Recross-examination 2:8 56:25 Rectenwald 11:19 Redirect 2:7 55:5 reference 14:10 52:17 referenced 30:9 referred 41:1 52:5 refused 34:13 regard 42:18 57:18 regarding 3:13 13:13 20:3,18 21:12,17,25 22:16 23:8,18 25:13 26:14 30:5 31:19 44:14 55:8 56:13 regular 7:4 10:11 26:5 27:24 regulation 8:15 30:21 32:4 regulations 51:18 regulators 27:9 relate 44:18 48:8 49:4 53:17 related 3:10 22:4 40:18 relating 49:5 relative 21:2,15 release 15:14 released 15:16 remember 44:22 53:12 53:18 58:19 remove 24:2 removing 19:18 repeat 4:17 15:22 rephrase 4:16 reply 42:16 report 24:8 32:10 34:6 34:14 38:25 39:24 40:2,9,17,25 46:24 47:6,8,13 51:22 52:3 57:6 58:2 reported 1:24 23:25 24:21 38:24 47:22 48:7 reporter 4:3 </p>
--	--	---	---	--

reporting 1:25 24:6 reports 39:25 40:7 41:7 represent 3:9 reprinted 43:1 request 13:1 20:10 required 10:13 14:4 20:15,20 21:5 23:24 23:24 24:15 25:6,8 25:17,19 26:22,24 31:12,13 36:22 37:18 41:5 57:8,12 requirements 13:12 requires 27:10 residence 24:8,11,23 respect 21:21 Respirable 51:7 respirator 23:16 respirators 20:4,6 31:25 36:9,22 respiratory 16:20 28:1 28:2 40:20 41:14 48:8 49:5 respond 4:8,10,19 54:6 response 54:10 56:1 57:23 responses 4:5 responsibilities 10:7 17:12 32:13 responsibility 20:25 21:2 32:7 responsible 10:9,13,15 10:18 30:22 restricts 27:10 result 30:17 resulted 49:3 results 50:18 54:9 returned 6:7 review 3:17 14:17 16:25 17:13,14,15,18 30:15 40:15 43:19 47:19 56:20 57:22 reviewed 16:24 17:2,4 17:21 21:22 reviewing 16:25 Rich 3:9 Richard 1:15 right 5:15 8:4,5 9:18 10:6 12:7 15:7,18 18:4,8,13 21:20,24 24:23 27:13 30:3 34:16 41:25 42:2 43:2 46:2 50:20,22 57:7 Robare 11:12,14,17 Robare's 11:13 Robin 22:16,17,18,21 22:23 23:8,9 42:15 Rochester 8:22 room 20:9 rotate 31:3	Router 51:11,12 routers 34:22 RPR 1:24 rules 3:17 run 20:21 running 27:14 <hr/> S S 3:1,1 safe 10:18 45:23 safety 5:6,13,17,23 6:19 8:10,11,15,16 9:3,4,21 10:2,7,10,11 10:15 12:2,3 14:17 17:12 20:23,24 21:5 22:5 23:23 26:1,2,6 30:23 32:12 42:6 45:16,18 46:19,23,23 51:20 56:16 safety-related 8:13 same 12:6 21:15 24:11 24:21 39:22 47:7 sample 51:9,13 samples 7:2 51:10 sampling 34:18,19 sanitation 10:11 49:9 sanitized 49:20 Sapko 42:15 44:18 saw 14:17 18:12,16,23 18:24 36:8 39:18,20 43:12,14,15 46:9 50:14 51:7,24 sawdust 27:18 sawed 14:20 sawing 15:13 17:24 18:1 20:19 22:19 27:1 saws 19:19 20:4 27:15 34:22 36:11 says 36:9 51:7 52:11,12 52:14,21 scheduled 3:12 school 5:21 6:12,14 Science 5:7,8,18 scope 32:6,12 screwdrivers 37:22 second 24:17 38:9,10 section 51:22 sector 49:16,18 see 8:18 17:17 19:6,9 35:12 43:16 46:8 49:19 50:7,12 seen 35:9,11,18 43:9 46:14 50:21 send 12:25 34:6,10,11 34:12 39:24,25 40:11 40:13,13,14 47:17,17 57:23 sending 34:14 sends 37:16 40:1	seniority 13:6 Sennett 1:11,16 sent 34:5,8 58:5 separate 57:5 separately 26:23 September 42:15 serious 52:20 53:11 service 40:2 services 39:24 40:8,9 40:18,23 set 34:18,20,22,23 seven 55:11 shaking 4:6 shaper 51:11,12 sheet 14:17 16:22 17:1 17:4,16 21:21 29:22 51:20 sheets 17:9,13 shift 27:3,4 shifts 12:18 shipments 11:7 shirts 23:23 25:17 shoes 23:23 Shop-Vac 27:19 36:11 39:19 Shop-Vacs 27:7,20,21 27:23,24 55:20 shoulder 48:25 show 50:16 showed 40:22 showing 35:2 sic 29:11 46:10 49:9 51:7,9,13 57:15 sick 54:24 side 34:4 Siggers 3:11 Signature 58:23 silica 6:18 7:3,6 15:8 51:4,4,7,10,11,12 silicosis 16:12 silverware 11:2 simple 4:1 simply 4:6,16 since 10:5 12:4 38:18 sit 44:5 six 49:1 size 12:19 skill 13:24 skilled 13:25 skin 16:17 28:1,3 36:14 38:20,23 41:14 48:8 56:12 small 14:22 18:25 28:17 smaller 29:13,17,17 Smethport 7:17 smoke 38:16 smoking 36:15 38:8,8 38:14,14,16,18 some 3:12 6:5,22 10:12	14:2,16 15:14,16 17:10 18:5,7 20:23 20:23 22:20 27:8,12 27:12,15,17 28:16 32:18 33:7,12 39:24 40:13 41:18,19,19,23 46:4,5,6,9 48:18 50:6 50:10,10,11 55:10 57:21 58:14,15 somebody 13:10 41:3 someone 26:21 40:22 something 25:24 38:25 42:5 44:8 47:9 53:7 56:9,10 57:14 somewhat 3:19 4:12 soon 54:13 58:13 sorry 15:6 28:24 52:2 sort 15:14 sought-after 13:20,21 source 21:7 22:15 sources 28:5,8,9 special 26:11 28:15,16 28:20 29:12,15 30:4 specialist 12:2,3 specific 30:16 specifically 30:5 specifications 37:16 spend 33:22 spent 50:9 spray 28:12,21 29:8 spread 29:2 staff 10:15,19 11:23,24 13:1 19:15 21:24 22:22 23:4,8 26:20 31:4 33:16 36:11,13 39:3,14,23 45:25 47:2,3,3,4,13,17,20 47:21,25 48:4,6 54:23 staffing 12:10 staff-related 47:24 stand 39:9 standards 33:8,14 34:7 34:13 start 7:8 13:3 started 3:16 7:11,13,15 29:23 30:1 50:10 state 4:23 32:2 stated 30:11 31:24 44:5 44:8 statement 43:25 53:22 54:12 statements 44:13,19 states 1:1,19 36:7 44:2 status 10:23 stay 39:6 Stephen 1:9 2:3 4:25 sticking 41:24 stood 33:12,12 stop 11:4 38:9	stopped 11:6 stored 29:10,14 strap 26:7 Street 1:11,16,19,22 strictly 20:16 45:18 strong 37:20,23 structure 12:4,10 struggle 53:23 stuff 38:11 45:11 subject 6:24 42:15 subjects 8:13 substance 43:20,21 44:19 substances 22:24 suck 37:24 sucked 37:22 suction 27:16 sufficient 33:25 Suite 1:19 summer 24:3 supervised 11:18 31:3 supervising 12:11 supervisor 11:10,11,17 11:21 31:12,19 33:18 39:25,25 40:5,14 supervisors 20:25 21:3 21:15 support 34:10 sure 10:10 15:23 19:15 24:18 32:20,23 54:11 55:21 57:24 suspect 36:2,4 SVF 51:11 sweep 27:6,13 38:11 sweeping 55:22 swept 27:13 38:4 sworn 3:2 synthetic 51:9,13 system 9:20 18:10,17 18:19 19:18,21,25 20:7 27:14,16 33:24 37:3,6,9,20,20 46:6 58:18 systems 37:7 <hr/> T T 3:1 table 18:11 20:4 34:21 take 6:2 14:5 26:19 28:7,25 38:25 41:5 43:19 51:6 55:12 57:15,20 taken 1:9 18:9 57:24 talk 49:23 talked 9:22,23 34:4 40:5 54:22 talking 48:2 58:13 tape 37:22 teach 20:20 Technology 5:7 6:1,16
--	---	--	---	--

8:9 tell 4:16 25:14 33:21 41:16 47:10 50:23 54:24 tenure 56:14 termed 53:11,13 terms 12:10 13:5 55:17 test 50:19 testified 3:2 45:5 46:7 46:21 48:16 53:20,22 53:24 56:2 testimony 2:3 28:4 testing 33:3,17 34:1 tests 32:16 thank 43:8 44:25 58:21 their 11:7,8 12:1 20:16 20:20 21:7 22:6 23:22,23,23 24:3,7,7 24:8,11,11,23 25:10 25:12 26:17,19,22 31:12 37:7 39:25,25 40:14 41:3 55:15 56:12,12 57:15 themselves 34:12 themselves 19:7 30:19 46:6,12 49:24 thick 49:2 thing 39:21 42:5 think 5:12 7:20 9:2 14:12 23:3 27:24 33:22,22 34:22 36:10 37:9,10 42:19 43:14 45:10 50:3 56:9 third 44:1 thoroughly 17:19 though 26:4 37:2 thought 33:23 54:24 thousand 37:12 three 5:5,13 7:20 11:16 19:14 23:2 39:3 50:3 50:3 three-week 47:4 through 3:18 9:3,5,16 9:20 18:16 28:5 32:10 38:19,21 56:11 throughout 27:4 34:23 tie 42:1 ties 41:20,24 42:2 tight 26:7 tight-fitting 25:21 26:4 26:5 till 35:16 time 4:13 7:24 11:20 12:15 14:10 19:22 23:18 25:5 29:21 31:1 34:2 38:21 43:12,15,16 48:10,18 58:4 times 19:14,25 23:2 39:3 50:3,3	today 3:12 35:10,19 43:10 today's 43:4 told 34:9,9 46:16 tolerate 44:3 tool 20:9 tools 37:21 top 27:5 38:4 46:11 58:17 topic 6:18 total 34:24 51:5,6,8,12 totally 11:6 49:16 tough 27:8 toward 5:22 train 21:4,6 31:12 trained 20:24 25:9 trainee 12:3,6 training 5:6,14,17 7:14 8:8,10,15,19,19,19 9:1,3,5,12,12,14,21 20:17,21,23 21:1,4,8 21:12,16 30:4,9,15 31:10,16,17,19 32:1 32:4 transcribed 4:2 transcript 4:4,8 transport 45:11 traumatic 41:8,11 trays 11:2 trial 3:24 true 21:15,20 try 4:9,10 Tuesday 1:10 turn 40:13 51:21 twisted 42:2 two 11:24 12:11,14,18 12:22 37:6 38:3 43:24 type 11:3 14:2 15:17 22:19 33:7 40:19,25 41:7 52:11,14 56:14 types 27:19 52:16 typically 39:6 typo 42:25 T-shirts 24:2	57:4 understood 4:20 UNICOR 1:21 3:13 10:21,23 11:4 12:16 12:23,24 13:2,8,11 13:15,21,24 14:3,5 17:11 19:12,13 20:6 21:1,3,9,16 23:2,18 26:14,21 30:23 32:2 41:9,19,23 42:4 45:19,21 47:20 48:1 48:5,6,10 UNICORs 13:9 United 1:1,19 units 26:17 34:19 University 5:10,18 8:2 8:5 until 13:3 update 8:14 updates 8:16 9:15 use 4:9 15:20 18:11 20:3,6 21:9 27:7,8,12 29:2,2 31:25 38:10 38:11 55:19 used 24:17 28:12,14,15 28:17,18 36:16,23 38:4 39:19 41:20 46:9 using 19:7 29:13,15,23 30:1 40:24 46:5,9 54:25 56:2 usually 4:15 utilize 38:5 utilized 30:17 32:5 utilizing 20:4,13	waived 58:23 walk 41:24 49:17 walked 38:20 walking 23:3 38:19 walks 19:16 want 24:18 33:22 39:17 43:20 47:11 49:7,11 50:5 51:21 55:16 wanted 20:9 25:10 34:6 34:10,11 46:4,21 48:13 53:21 Ward 3:11 warden 11:14 33:6 34:2 Washers 26:16 Washington 1:22 wasn't 57:25 way 33:13 wear 20:9,10,12,15 23:24 24:2,15 25:6,9 25:11,11,17 31:25 52:13 wearing 25:2,14 32:8 week 19:14 23:3 39:3 weekly 8:15 10:12 weeks 8:13 weld 58:17 well 3:23 4:1 11:6 16:22 17:20 18:11 31:12 37:18 44:6 46:9 50:2 55:17 57:13 went 5:15,15 7:5,25 9:3 18:18 40:2,4 55:14 were 3:14 5:21,22 7:5 7:24 13:3,9,12,20 16:8 19:11,17 20:8 20:10,12 23:24 24:2 24:15,16 25:3,5,6,6,9 25:25 26:13,16 27:19 27:23 28:19 29:6,10 29:10,13,15 30:12,13 30:17 31:4,5,5,8,9,25 32:15 33:8,14,16 34:22,23 36:22 37:8 37:10,11,11 38:15,20 39:2 41:17 42:3 46:5 47:25 50:7,8,11 51:4 53:10,10,13 54:24,25 55:15 56:13 57:3,4 58:3,14,20 weren't 20:15 25:8,17 25:19 26:4,5 West 1:11,16 WESTERN 1:1 we'll 35:2 40:15 41:2 47:18 50:24 we're 10:9,9,10,14,15 41:4,4,5 42:6,7,8,19 58:10	we've 41:11 48:4 whatsoever 48:12 49:7 while 7:17 8:8 27:14 whole 14:16 43:22 50:9 willful 52:20 wise 57:14 Witness 24:24 43:22 46:25 54:1 woke 34:15 wondering 42:22 55:17 wood 28:18 45:6,11 49:8,8 woodworking 11:9 45:13 49:14,15 word 4:9 words 24:6 wore 23:22 work 7:5,19 11:24 12:24 14:5 23:25 24:6,8,11 26:22 30:10 41:18 49:13 worked 6:9 7:16 9:19 12:16 worker 22:20 Workers 48:16,19,23 49:4 working 5:22 13:4 23:19 26:21 31:14 38:23 39:12 40:3 48:10 54:25 workplace 30:17 work-related 39:22 40:10,11,12,12 47:6 47:13,22 48:7 world 49:10,22 worn 23:19 26:14 wouldn't 13:17 19:2 wrench 37:25 wrenches 37:21 write 57:23 writing 22:23 written 32:24 33:5 52:19 wrong 23:6 58:10 wrote 35:23 36:2,4
	U	V		X
	U 3:1 uh-huh 4:11 35:14 um-hum 24:13,18 28:22 29:5 41:22 44:7 48:15 unclear 4:12,15 under 11:24 51:18,19 53:5,9 underneath 27:7,12 38:6 46:10 understand 4:14 9:16 12:9 53:3 understanding 42:19	v 1:4 vacuums 27:19 variety 30:13 various 9:15 ventilation 18:10,17 19:18 verbal 49:25 verbalize 4:5 verbally 22:23 23:9 very 4:23 13:21 17:19 22:3 31:5 34:5 42:6 47:5 vicinity 15:14 36:15 victorious 51:9 victorious 51:13 violation 52:11,14,22 52:25 violations 32:9 52:17 voluntary 31:25		X 2:1
		W		Y
		W 1:3 wait 13:3		yeah 7:23 13:25 17:14 29:3 30:3 40:24 41:11 42:24 47:3 48:4 50:22 year 8:14,25 21:4 47:24 48:5 years 5:6,13 7:20 10:4 11:16 York 8:22

0	21st 43:6 24 37:12 29 30:21 32:2			
01 33:1 03 43:7 03-323 1:3 03-355 1:4 03-368 1:4 04-011 1:5 05-160 1:3	3 3 2:4,13 5:2 30:8 50:25 51:1 52:5 3M 32:5 30 27:10,11 51:11 31st 33:1 34,000 37:8 35 2:11			
1	4 4 2:14 52:8,9 400 1:22 4000 1:19 42 2:12 45 2:5			
1 2:11 31:24 35:3,6,9 35:13,17 36:18 51:22 52:2,5 1.1 51:8 1.50 51:13 10th 1:11,16 10:01 1:10 10:56 35:16 11,000 37:13 11:00 35:16 11:37 58:25 12 10:4 37:10 120 1:11,16 13,000 37:14 1400 12:21 15 51:6,19 150 12:18 15219 1:20 16 20:2 47:24 16th 14:12 15:24 16501 1:12,17 16701 5:3 17th 50:8,9 18 23:4 18th 50:8,9 19 1:10 1910.1200(h)(2)(ii) 30:21 1910.134 32:2 1975 6:15 1989 30:2 1993 9:8 1994 10:5 1995 8:24	5 51 2:13 52 2:14 54 2:6 51:7 55 2:7 55-gallon 29:10,16 56 2:8			
2	7 700 1:19 79 5:16			
2 2:12 30:8 31:24 42:11 42:14 43:9 44:1,20 52:5 20 37:12 51:11 20-some 37:12 200 12:18 2001 12:15 34:17 56:19 2002 12:5,15 2003 12:15 14:12 15:24 20:2 28:10 36:19 43:16 49:24 56:19 2006 1:10 42:15 20534 1:22	8 8 42:15 82 5:16 8500 32:5 860/861 28:11 30:14 89 7:9,11			
	9 9100 37:11 92 5:12			